TSD File Inventory Index

Date: knay 16, 2000 Initial: (MKenyas)

Facility Name: (JE (Dayle 2 a)	/	1 2 Mart - Ore tolder Actor)	
Facility Identification Number: OHD	059	no (Plant - Ore Folder Site) 1061 317	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	1/	.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	·
.2 Notification and Acknowledgment	V	C.1 Compliance - (Inspection Reports)	
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.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	**Blassyllan
.5 Change Under Interim Status Requests	-	.2 Import/Export Notifications	
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	1
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.1 Correspondence		.4 RFA Reports	*
.2 Closure/Post Closure Plans, Certificates, etc	1	D. 2 Corrective Action/Facility Investigation	
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.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
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.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transi	nittal Letter to Be Include	d with Reports.		
Comments:	Doguments d	over institut	individual Alte	v per Dehelule!
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UNITED STATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: RCRA ACTIVITIES

JUL 1 5 1982

Jim Magella, Mfg. Eng. General Electric Co., Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266

USEPA ID No. OHD059061317 RE: Interim Status Acknowledgement FACILITY NAME: General Electric Co., Ravenna Lamp Plant

Dear Mr. Magella:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely.

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: H. J. Singer, Vice President

EPA ID NUMBER

GENERAL ELECTRIC CO., RAVENNA LAMP PLANT

OHD059061317

FACILITY OPERATOR

FACILITY NAME

GENERAL ELECTRIC CO

FACILITY OWNER

GENERAL ELECTRIC CO

FACILITY LOCATION

6800 N CHESTNUT STREET

RAVENNA

OTHER

OH 44266

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

1210
T01

1200
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or S



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

CHD059061317 REACKNOWLEDGEMENT

GENERAL ELECTRIC CO
6800 NORTH CHESTNUT STREET
RAVENNA OH 44266

INSTALLATION ADDRESS AND NORTH CHESTNUT STREET
RAVENNA OH 44266

EPA Form 8700-12B (4-80)

09/29/81

Form Approved OMB No. 158-S79016

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-13

10 MAR 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Magella Manufacturing Engineer General Electric Company Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266

> RE: Part B Call-in General Electric Company OHD 059 061 317

Dear Mr. Magella:

Some time ago, you should have received an acknowledgement of the United States Environmental Protection Agency's (U.S. EPA) receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, your facility is currently authorized with interim status under Section 3005(e) of RCRA. This letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR §270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility. The Part B application is due six months from the date you receive this letter.

Enclosed is a copy of 40 CFR Part 270 which lists the items required for submitting the Part B permit application for your facility. A copy of the "Part B Completeness Checklist" is enclosed to help you in preparing a comprehensive and complete permit application.

If your facility chooses not to pursue a full RCRA permit, you may withdraw your intent to seek a permit by filing a closure plan with the U.S. EPA and Ohio Environmental Protection Agency (OEPA). Federal RCRA closure regulations (40 CFR Subpart G) require that you submit a closure plan to: George Hamper (5HS-13), Chief, Ohio Section, U.S. EPA - Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both Agencies is necessary prior to commencement of any activities that are part of the closure plan.

Some facilities may be unable to comply with the financial responsibility requirements for liability coverage under 40 CFR §264.147. If your facility is unable to meet these requirements, or any other applicable requirements of 40 CFR Parts 270 or 264, then we must deny the permit for your facility. In that case, you would probably want to submit a closure plan under 40 CFR Subpart G rather than the completed Part B application.

If your facility never actually treated, stored, or disposed of hazardous waste under RCRA, then it is not be necessary to submit either a Part B application or a closure plan. However, you will have to submit a Part A withdrawal request for review. This request must demonstrate that your facility never actually qualified for interim status because either: 1) the waste was not a hazardous waste as defined in 40 CFR §261; 2) that there has been no treatment, storage, or disposal of the waste since November 19, 1980; or 3) that the hazardous waste management process was exempt from the permitting requirements of RCRA. For example, storage of waste generated on-site in containers or tanks less than 90 days is exempt from the permitting requirements of RCRA in accordance with 40 CFR §262.34. Likewise, treatment in a wastewater tank is exempt under 40 CFR §270.1(c)(2)(u). A withdrawal request must incorporate the signatory requirements contained in 40 CFR §270.11.

The Agency is committed to conducting the RCRA permitting process as efficiently as possible. Consequently, you may want to contact Mr. Daniel Patulski of my staff, at (312) 886-0656, to discuss any questions or concerns you have regarding the preparation of the application. Mr. Patulski will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Should you have any questions about confidentiality of information, please refer to the enclosed rules on confidentiality as set forth in 40 CFR Part 2 and 40 CFR $\S270.12$ of RCRA. If you anticipate asserting a claim of confidentiality please review the above-referenced enclosure regarding substantiation of confidentiality ($\S2.208$) that sets forth the criteria that must be met for claiming confidentiality.

Please be reminded that submission of the Part B application must be made six months from the receipt date (i.e., date this letter is received). Upon completion of the application, please send two copies to the U.S. EPA and three copies to the OEPA. Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
Post Office Box A-3587
Chicago, Illinois 60690-3587

Send three copies to:

Thomas Crepeau
Ohio Environmental Protection Agency
Division of Solid & Hazardous Waste Management

Post Office Box 1049 Columbus, Ohio 43266-1049

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR $\S270.10$. In addition, failure to answer this request may also result in subsequent enforcement action by the U.S. EPA.

Upon receiving the Part B application, the U.S. EPA will coordinate its review with the OEPA and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and OEPA, in lieu of U.S. EPA, will make the final determination on your permit application.

A copy of 40 CFR Part 264 is enclosed to help you in addressing the requirements and standards for the operation of treatment, storage and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of the July 14, 1986, hazardous waste tank system regulatory amendments is also enclosed. These new rules establish technical standards and operating procedures for the owners and operators of tank systems that use tanks for accumulating, storing or treating hazardous waste. These rules may be applicable to your facility and are, therefore, enclosed for your information.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA and contains many provisions which may affect your facility. Under the corrective action requirements of HSWA, your facility is required to correct all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that the corrective action requirements apply to all solid waste management units, not just the hazardous waste management units subject to the permitting requirements. Enclosed is a document entitled "Certification Regarding Potential Releases from Solid Waste Management Units." It is necessary for you to complete and submit this form with your Part B application to help address corrective action requirements. If you previously completed and submitted this form, and if the information is accurate and up-to-date, you may simply include a copy of your previous submittal in your Part B application.

This Agency looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely.

William H. Miner

Acting Associate Division Director

Office of RCRA

Enclosures: 40 CFR Part 270 (applicable parts)

Part B Completeness Checklist 40 CFR Part 2 (applicable parts) 40 CFR Part 264 (applicable parts)

Certification Regarding Potential Releases

from Solid Waste Management Units

cc: Charles Taylor, OEPA

District Office Manager, OEPA

Ed Lim, OEPA



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149



Richard F. Celeste Governor

March 4, 1988

RE: OHIO PART B CALL-IN
US EPA ID NO.: OHDO59061317

OHIO PERMIT NO.: 02-67-0158

CERTIFIED MAIL

Mr. Jim Magella, Manufacturing Engineer General Electric Company 6800 North Chestnut Street Ravenna, OH 44266

Dear Mr. Magella:

The purpose of this letter is to formally request the submittal of Part B of your Ohio hazardous waste permit application according to the requirements of Rule 3745-50-40(A)(2) of the Ohio Administrative Code.

Although you may have already submitted a Part B application to the US EPA, that application was for your federal RCRA permit. According to Ohio regulations, a Part B application must be reviewed by the Ohio EPA as part of the renewal process for your Ohio hazardous waste permit application.

Ohio regulations provide up to six months for submittal of the Part B permit application. You are requested to submit the Part B within six months of the date of this letter in order to expedite the review of your application and the issuance of a final determination of the Director or of the Hazardous Waste Facility Board, as appropriate. Please submit two copies of the Part B as follows:

Ohio EPA
Division of Solid and Hazardous Waste Management
Program Planning and Management Section
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

If you have submitted a Part B application to Ohio and US EPA under federal requirements and you do not wish to provide additional information, Ohio EPA will use the Part B that is on file for review. Please inform this office if the file copy is to be used. However, all applicants are required to submit a completed checklist as explained in the following paragraph.

Attached you will find a checklist of information to be included in a Part B application which cross-references 40 CFR 270 and 264 regulations with Rules 3745-50 to 3475-69 of the Ohio Administrative Code. Please complete this checklist stating precisely on which page(s), figure(s), etc. of your application each applicable Ohio rule has been addressed. If a rule is not applicable to your facility, please so indicate on the checklist.

If you have questions regarding the contents of this letter, or need additional guidance, please contact either Ed Lim, (614) 481-7239, or Thomas E. Crepeau, (614) 481-7217, of the Division of Solid and Hazardous Waste Management.

Electron Poros

Richard L. Shank, Ph.D. Director

RLS/RR/ep 2067R/34-35

Attachment

cc: NEDO

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INSTRUCTIONS: Complete A through J to determine v	vheth	er yo	u need to	submit any permit application forms to the EPA. If you ans	wer "	yes" 1	o any
if the supplemental form is attached. If you answer "no"	to e	ach q	uestion, y	e parenthesis following the question. Mark "X" in the box in ou need not submit any of these forms. You may answer "no	" if y	our ac	ctivity
is excluded from permit requirements; see Section C of the	instr	ructio	ns. See also	o, Section D of the instructions for definitions of bold—faced	term	S.	
SPECIFIC QUESTIONS	YES	MAB	FORM ATTACHED	SPECIFIC QUESTIONS	YES	Name and Address of the Owner, where the Owner, which is the Owner, where the Owner, which is the Owner	K'X' FORM ATTACHE
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.?		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or		X	
(FORM 2A)			250	aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	19	20	21
 Is this a facility which currently results in discharges to waters of the U.S. other than those described in 	X	17	1.0	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to	19	X	21
A or B above? (FORM 2C)	22	23	24	waters of the U.S.? (FORM 2D)	25	26	2.7
Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	Х		V	 F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum con- 		X	
	28	29	30	taining, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	32	33
 Do you or will you inject at this facility any produced water or other fluids which are brought to the surface 		X		H. Do you or will you inject at this facility fluids for spe- cial processes such as mining of sulfur by the Frasch		X	
in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of		^		process, solution mining of minerals, in situ combus- tion of fossil fuel, or recovery of geothermal energy?		^	
oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	35	36	(FORM 4)	37	38	29
 Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in- 	77	X	- Barrey	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the	10	X	
structions and which will potentially emit 100 tons per year of any air pollutant regulated under the		^	MALLITY SA	instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean		^	FIRE
Clean Air Act and may affect or be located in an attainment area? (FORM 5)	1	41	42	Air Act and may affect or be located in an attainment area? (FORM 5)	43	44	45
NAME OF FACILITY							
SKIP GENERAL ELECTRI	C.	,C	0 M P	, A , N , Y ,	69		
FACILITY CONTACT							
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VIII. OPERATOR INFORMATION				B. Is the name listed I
8 GENERAL ELECT	RIC COMP	ANY		I tem VIII-A also th owner? YES NO
C. STATUS OF OPERATOR (Enter the		securioran constitución actividade anti-mission constitución de la con		, PHONE (area code & na.)
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15 16 X. EXISTING ENVIRONMENTAL PERMITS		40 41 42 4		
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C. RCRA (Hazardous Wastes)	E, 0	THER (specify)		
9 R 15 16 37 18	20 15 16 17 18		(specify)	iki tarah saman. Barah barah kalendaran kalendaran barah
XI, MAP				
Attach to this application a topographic the outline of the facility, the location of				
treatment, storage, or disposal facilities, water bodies in the map area, See instruct	and each well where it	injects fluids undergr		
XII. NATURE OF BUSINESS (provide a brief d				
THE PRODUCTION OF ENERGY			ARGE LAMPS; I.E.	, MERCURY,
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XIII. CERTIFICATION (see instructions)				
I certify under penalty of law that I have attachments and that, based on my inc	quiry of those persons i	immediately responsi	ble for obtaining the in	nformation contained in the
application, I believe that the information false information, including the possibility	on is true, accurate and ty of fine and imprisonm	complete. I am awar ent.	e that there are signific	cant penalties for submitting
A. NAME & OFFICIAL TITLE (type or print)	B. SIGI	va 79 Be/)		C. DATE SIGNED
H.J. SINGER, VICE-PRESIDEN	IT 📗 🧘	M. in		11/14/80
COMMENTS FOR OFFICIAL USE ONLY				
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III PI	ROC	ESSES	(continu	red !

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES ($code\ "T04"$). INCLUDE DESIGN CAPACITY. FOR EACH PROCESS ENTERED HERE

IV. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE COL	DE
POUNDSP	KILOGRAMS	
TONS	METRIC TONS	1

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT		D. PROCESSES
LINE NO.	HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	$D \mid 0 \mid 0 \mid 1$	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1) FOR OFFICIAL USE ONLY DUP DUP DESCRIPTION OF HAZARDOUS WASTES (continued) D. PROCESSES A. EPA HAZARD. WASTE NO B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) F 0 0 1 15,000 P U 2 2 8 Included with Above 725 P F 0 0 3 S 0 1 Included with Above U 0 0 2 5 640 P U 1 5 1 S 0 1 P 1450 S 0 1 6 F 0 0 5 U 1 5 4 Included with Above 8 D 0 0 2 500 P T 0 1 9 10 11 12 13 14 16 17 18 19 20 21 23 24 25 26

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from the front.

SCALE : /4 INCH = 50'





P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329



George V. Voinovich
Governor

Donald R. Schregardus
Director

April 2, 1993

Re: G.E. Ravenna Lamp Plant
US EPA ID No.: OHD059061317
Ohio ID NO.: 02-67-0158
Completion of Closure

G.E. Ravenna Lamp Plant Attn: Mr. Jim Magella 6800 North Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

According to our records, on July 12, 1989, the Director of Ohio EPA approved a closure plan and on December 11, 1991 approved an amended closure plan submitted by G.E. Ravenna Lamp Plant (GE) for their hazardous waste drum storage area located at 6800 North Chestnut Street, Ravenna, Ohio 44266. On October 20, 1992 and February 17, 1993, GE submitted to the Director certification documents stating that the hazardous waste drum storage area had been closed according to the specifications in the approved closure plans. Ohio EPA District Office personnel completed a certification of closure inspection on February 11, 1993 and subsequently reviewed certification documents pertaining to the hazardous waste drum storage area. Based on this inspection and subsequent review, the Ohio EPA has determined that the hazardous waste drum storage area has been closed in accordance with the approved closure plans and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and GE will maintain the status of a large quantity generator (LQG) of hazardous waste.

You should continue to use the identification number assigned to you for purposes of Ohio EPA manifest, recordkeeping, and reporting requirements as appropriate.

If you have any questions concerning your current status, please contact the Ohio EPA, Northeast District Office, Attn: Murat Tukel, 2110 East Aurora Road, Twinsburg, Ohio 44087, telephone number (216) 425-9171.

As specified in OAC Rule 3745-66-40, GE will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurences at this facility, in accordance with Rules 3745-66-43(H) and 3745-66-47(E) of the OAC.

G.E. Ravenna Lamp Plant Completion of Closure Pq. 2

If you intend to no longer pursue your Ohio Hazardous Waste Facility Installation and Operation Permit and wish to withdraw your permit, the following information should be forwarded to Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section at the letterhead address within thirty (30) days:

- 1. A formal request for withdrawal signed by an authorized representative according to Rule 3745-50-42(A-D) of the OAC (Enclosure 1) including a full explanation of your reasons for withdrawal of your application; and
- 2. A certification statement signed by the same authorized representative of your facility (Enclosure 2).

Upon receipt of the above items, Ohio EPA will review your submission along with any facility inspection report(s). If no additional information is necessary, your permit withdrawal request will be finalized.

Please note that this letter does not relieve you of any corrective action responsibilities that may be required.

Should you have any questions concerning this procedure, please contact Randy Sheldon, Division of Hazardous Waste Management, Data Management Section at the letterhead address or by telephone at (614) 644-2977.

Very truly yours,

Musicas E. Crepeau, Manager

Data Management Section

Division of Hazardous Waste Management

Enclosures

TEC/RS/ds

cc: Kevin Pierard, US EPA, Region V
Harriet Croke, US EPA, Region V
Hazardous Waste Facility Board
Randy Meyer, RCRA TAS, DHWM
Laurie Stevenson, HW ES, DHWM
Beth Barrett, DMS, DHWM
Mike Rath, DMS, DHWM
Murat Tukel, NEDO, DHWM





P.O. Box 1049, 1800 WaterMark Dr. Jolumbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329



George V. Voinovich Governor

CLOSURE PLAN APPROVAL nagement Division Waste PLAN REGION V.

CERTIFIED MAIL

December 11, 1991

RE: AMENDED CLOSURE PLAN

General Electric Company

OHD 059 061 317

Mr. James Magella General Electric Company 6800 North Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

On June 25, 1990, General Electric Company submitted to Ohio EPA an amended closure plan for a hazardous waste drum storage area (Part A Permit S01, Line 1) located at 6800 North Chestnut Street, Ravenna, Ohio. The amended closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Company's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the amended closure plan of General Electric Company in accordance with OAC Rule 3745-66-12. The public comment period extended from July 9, 1990 through August 13, 1990. No comments were received by Ohio EPA in this matter.

Based upon review of General Electric Company's submittal and subsequent revisions, I conclude that the amended closure plan for the hazardous waste facility at the General Electric Company as modified herein meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The amended closure plan submitted to Ohio EPA by The General Electric Company is hereby approved with the following modifications:

the reduction to be a true and accurate copy of the fall of in the records of the Ohio

By: Chiki Chackey Date 12/11/11

OMIO E.P.A. DEC II 91 Envirende dinactoria Jouan



Mr. James Magella General Electric Company Page Two

1. Closure Cost Estimate.

General Electric (GE) shall revise their closure cost estimate to conform with the additional activities being performed to complete closure. GE shall submit the updated closure cost estimate to Ohio EPA in accordance with OAC Rule 3745-66-42(A) and (B) within 15-days of the receipt of this letter.

2. Decontamination Procedures, Drain System.

GE mentions decontaminating the terra cotta drain line via low pressure washing of the line. Given the problems already associated with the clean-up of the upper section of the drain, a real possibility exists that the middle section of the pipe (from the south edge of the concrete drive, north to manhole #1) and the end section of the pipe (north of manhole #1 to manhole #2) are not sound. cotta pipe tends to be porous and leak readily; therefore additional washing may exacerbate the spread of contamination.

The closure plan is hereby amended to state that soil samples shall be collected prior to washing of the pipe (see revised Figure 4 for additional sampling locations) in order to determine whether soil contamination has come from the unexcavated sections of the pipe. If contamination is evident, then the pipe shall be excavated. If contamination is not found, then washing of the pipe may commence as per the closure plan.

З. Equipment Decontamination.

GE does not specifically indicate where the "decontamination zone" is located and how this zone will contain both liquid and solid residues from decontamination of equipment. The closure plan is hereby amended to state that the decontamination area will be constructed in a similar fashion as the one shown in Attachment A.

DEC 11 91

High mid braid totals declared

I contify this to be a true and accurate copy of the of the filed in the records of the Ohio Agency, is chihi Mackey Date 12/11/91

Mr. James Magella General Electric Company Page Three

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.A. \$9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved

certify this to be a true and accurate copy of the William document as filed in the records of the Ohio Environmental Protection Agency.

By: Criki Mackey Date 12/11/91

OEC 11 91 Litera disectoria courres a Mr. James Magella General Electric Company Page Four

closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerêly

Donald R. Schregardus

Director

DRS/PV/pas

CC: Tom Crepeau, DHWM Central File, Ohio EPA Paul Vandermeer, Ohio EPA, DHWM Lisa Pierard, USEPA - Region V Joel Morbito, USEPA - Region V Murat Tukel, NEDO, Ohio EPA

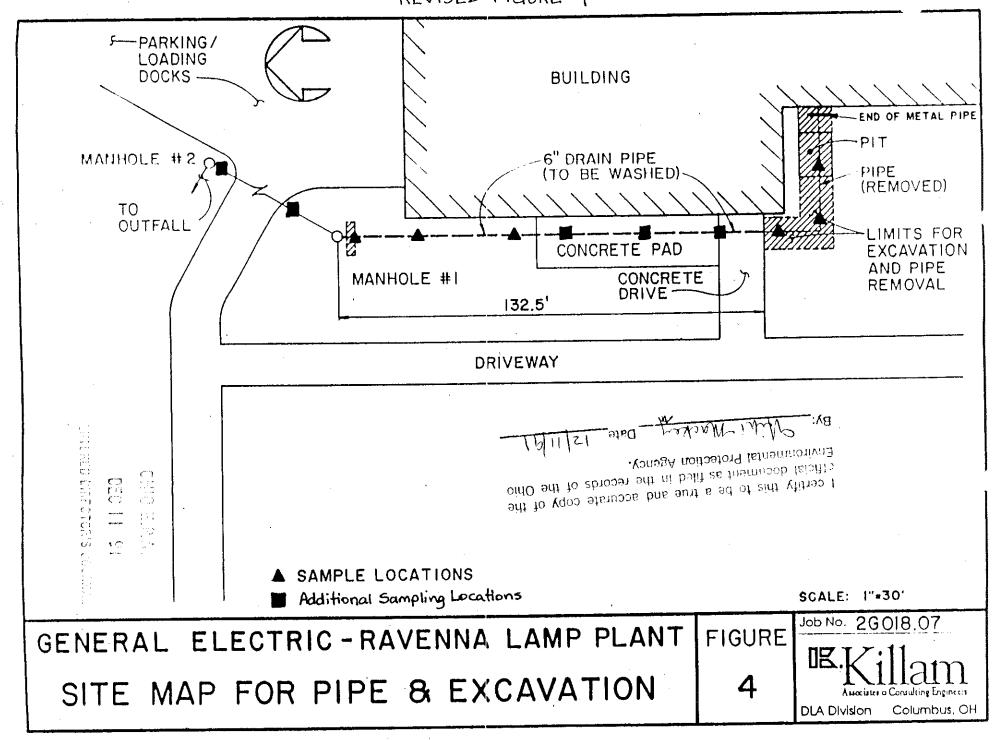
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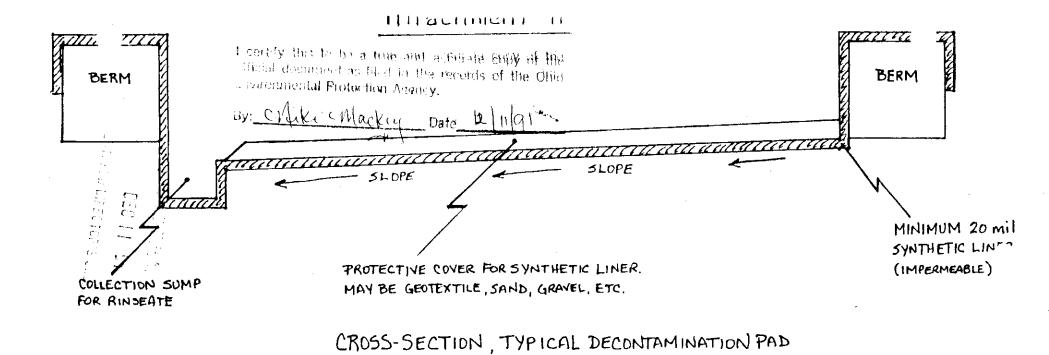
By: Chiki Chackey Date 12/11/91

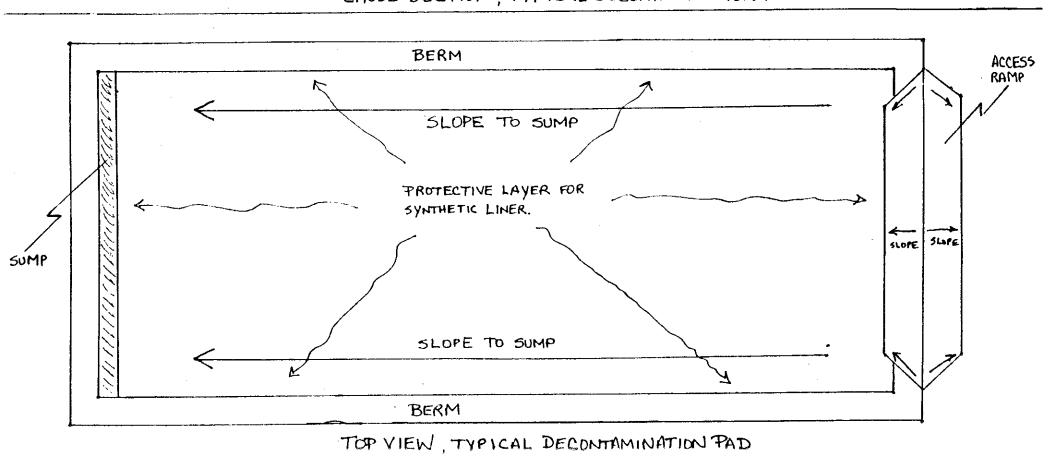
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DEC 11 51

WILLES BINECTON'S CEEDING:









State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 **Fax** (614) 644-2329

Don

Richard F. Celeste Governor

July 9, 1990

Re: G.E. Ravenna Lamp Plant

U.S. EPA ID No.: OHDO59061317 Ohio Permit No.: 02-67-0158 Amendment to Closure Plan

G.E. Ravenna Lamp Plant Attn: Mr. Jim Magella 6800 N. Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

A public notice acknowledging the Ohio EPA's receipt of an amendment to the closure plan for the G.E. Ravenna Lamp Plant located at 6800 N. Chestnut Street, Ravenna, Ohio will appear the week of July 9, 1990, in The Record Courier, Ravenna, Ohio. The Director of the Ohio EPA will act upon the amendment to the closure plan request following the close of the public comment period, August 13, 1990.

Copies of the amendment to the closure plan will be available for public review at the Portage County District Library, 10482 South Street, Garretts-ville, Ohio 44231 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

I may be contacted at (614) 644-2977 if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager

Data Management Section

Division of Solid & Hazardous Waste Management

TC/RS/ds

cc: Lisa Pierard, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DSHWM, RCRA TAS
Andrea Dakoski, Ohio EPA, DSHWM, NEDO

2531R(32)

8 4

RECEIPT OF AMENDMENT TO HAZARDOUS WASTE CLOSURE PLAN

For: G.E. Ravenna Lamp Plant, 6800 N. Chestnut Street, Ravenna, Ohio 44266, U.S. EPA ID No.: OHD059061317, Ohio Permit No.: 02-67-0158. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of an Amendment to the Hazardous Waste Facility Closure Plan for a Hazardous Waste Drum Storage Pad for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Amendment to the Closure Plan will be available for public review at the Portage County District Library, 10482 South Street, Garrettsville, Ohio 44231 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087. Comments concerning the Amendment to the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

July 12, 1989

Re: Closure Plan General Electric (GE) Ravenna Lamp OHD 059 061 317/02-67-0158

Mr. James Magella General Electric (GE) Ravenna Lamp 6800 N. Chestnut Street Ravenna. Ohio 44266

Dear Mr. Magella:

On September 13, 1988, GE Ravenna Lamp submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at 6800 N. Chestnut Street, Ravenna, Ohio. Revisions to the closure plan were received on May 5, 1989. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that GE Ravenna Lamp's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of GE Ravenna Lamp in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that, with modifications, the closure plan for the hazardous waste facility at GE Ravenna Lamp meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by GE Ravenna Lamp is hereby approved with the following modifications:

1. GE-Ravenna Lamp shall have the independent, professional engineer (PE) observe not only sampling activities (both rinseate and soils) but also have him/her inspect the pad for cracking, supervise sealing of the drainage piping, supervise any removal of contaminated soils, and supervise/ensure that the health and safety plan is appropriately implemented.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

Like the copy of the Ohio Survivonmental Protection Agency.

By Carolin prevdenius Date 7/12/8'9

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

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- 2. Prior to rinsing the six-inch drain, GE shall be sure that there is no leakage occurring that may allow hazardous wastes or hazardous waste constituents to escape into surrounding soils.
- 3. GE has not indicated that they have made any contact with the Nuclear Regulatory Comission (NRC) regarding the radioactive thorium wastes stored at the facility. Within 30 days of the date of this letter, GE shall submit all correspondence with the NRC to Ohio EPA (as per comment #2 in the Director's February 21, 1989 final disapproval letter) to Andrea Dakoski, Ohio EPA, NEDO, and Paul Vandermeer, Ohio EPA, Central Office, DSHWM. GE shall also provide Ohio EPA with documentation for the rinseate "clean" levels chosen for radioactive substances as listed in the revised closure plan.
- 4. Within 30 days of the date of this letter GE shall provide justification for the background limit given for thorium.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq. of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing herein shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seg., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response actions relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

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I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

JUL 1 2 1989

By: Caroly necessary Date 7/12/89

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely.

Richard L. Shank, Ph.D.

Director

RLS/PV/pas

cc: Paul Vandermeer, Ohio EPA, DSHWM Lisa Pierard, US EPA-Region V Joel Morbito, USEPA - Region V Tom Crepeau, Ohio EPA, DSHWM Central File Andrea Dakoski, NEDO, Ohio EPA

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Obio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

JUL 1 2 1989

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Cercy Necodines Date 1/12/89



Discharge Production Department Ravenna Lamp Plant General Electric Company 6800 N. Chestnut St., Ravenna, OH 44266 216 297-0861

May 2, 1989

Mr. Thomas Crepeau Ohio Environmental Protection Agency Division of Solid and Hazardous Waste Management 1800 Water Mark Drive Columbus, Ohio 43215 RECEIVED

MAY 04 1989

OFFICE OF RORA
Waste Management Division
U.S. EPA, REGION V

Re: Container Storage Closure Plan General Electric Company Ravenna Lamp Plant

Dear Mr. Crepeau:

Enclosed are three copies of the revised closure plan for the drum storage area located at the plant. The plans have been changed to include the requirements list in the agency's letter dated January 17, 1989.

If you have any questions regarding the contents of this plan, please contact Jim Magella at (216)297-0861 at anytime.

Sincerely yours,

Dave Hanson, General Manager Discharge Production Department

xc: Ms. A. Dakoski OEPA Ms. R. Strom USEPA

Enclosures

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State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

DAN



January 17, 1989

Richard F. Celeste Governor

CLOSURE PLAN DISAPPROVAL Issuance Date JAN 18 1989 Effective Date FEB 2 1 1989

CERTIFIED MAIL

Re: Closure Plan General Electric Co. - Ravenna Lamp Plant OHD 059 061 317/02-67-0158

Mr. James Magella General Electric Co. - Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266 RECEIVED)

Dear Mr. Magella:

OFFICE OF ROBA Wasto Management Givision U.S. ERM, REMONEY

On September 13, 1988, General Electric Co. - Ravenna Lamp Plant submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at 6800 N. Chestnut Street, Ravenna, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Co. - Ravenna Lamp Plant's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of General Electric Co. - Ravenna Lamp Plant in accordance with OAC Rule 3745-66-12. The public comment period extended from October 24, 1988, to December 1, 1988. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at General Electric Co. - Ravenna Lamp Plant does not meet the performance standard contained in OAC Rule 3745-66-11 and does not comply with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by General Electric Co. - Ravenna Lamp Plant is hereby disapproved (see Attachment A).

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

Ey: Mary Cavin Date 2-21-89

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

FEB 21 1989

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to Lisa Pierard, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. Review and approval of the closure plan by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is issued as a proposed action pursuant to ORC Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within thirty (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, OH 43266-0149.

A modified closure plan addressing the deficiencies enumerated in Attachment A must be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter in accordance with OAC 3745-66-12 and 3745-66-18. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Andrea Dakoski, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087, (216)425-9171.

Sincerely

Richard L. Shank, Ph.D.

Director

RLS/PV/ps

cc: DSHWM Central File, Ohio EPA Lisa Pierard, USEPA, Region V Andrea Dakoski, NEDO, Ohio EPA Paul Vandermeer, DSHWM, Ohio EPA

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I certify this to be a true and accurate copy of the efficial document as filed in the records of the Ohio. Environmental Protection Agency.

By: May Carri Date 2-21-89

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

ATTACHMENT A General Electric Co. - Ravenna Lamp Plant

- General Electric shall prepare specific drawings and descriptions of the drum storage area including details on floor slope(s), extent of floor cracks, and the floor drains and subsequent drainage into the leach bed.
- 2. The company shall indicate in the closure plan that there are mixed radioactive/hazardous wastes stored on-site. The storage area for these wastes shall be included in the clean-up of the drum storage area. The company shall contact the Nuclear Regulatory Commission (NRC) in order to determine any additional regulations for the mixed radioactive/hazardous wastes. The company shall provide copies of correspondence with the NRC to Andrea Dakoski, NEDO, Ohio EPA, Twinsburg and Paul Vandermeer, Central Office, Ohio EPA, Columbus.
- 3. The schedule for closure shall be modified to include the activities for which the independent, registered, professional engineer will be present in order to certify that the particular activity is proceeding in accordance with the approved closure plan.
- 4. General Electric shall specify the measures taken to provide for safety of personnel performing closure in addition to fire prevention and protection. This shall also include decontamination procedures for personnel performing closure activities.
- General Electric shall estimate the volume of rinsewaters generated during pad decontamination procedures. Prior to rinsing, cracks in the concrete pad shall be examined to determine the extent and depth of the crack. If the crack is continuous through the depth of the concrete, then the crack shall be temporarily sealed prior to the initiation of rinsing. Also, all floor drains shall be temporarily sealed prior to the beginning of rinsing.
- 6. General Electric shall provide a plan to dispose of or decontaminate the drain system and leach bed associated with the hazardous waste drum storage area. This plan shall also include specifics on random sampling of soils beneath the cracked areas of the pad, and random soil sampling beneath the drain pipes and leach bed. Soil analysis parameters shall include all specific wastes stored on the pad and the characteristic of ignitability.

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By: May Carry Date 2-21-19

Ohio Environmental Protection Agency Entered director's Journal

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- 7. The concrete pad and other equipment shall be considered clean when concentrations of hazardous waste or hazardous waste constituents fall below the maximum contaminant level (MCL) as promulgated in OAC 3745-81-11 for inorganics and OAC 3745-81-12 for organics. If an MCL is unavailable for a particular contaminant, then the maximum contaminant level goal (MCLG) shall be used as the clean standard (see 40 CFR 141.50). If neither an MCL or MCLG is available for a particular hazardous waste constituent, then 1 mg/l shall be used as the clean standard. If the MCL or MCLG falls below the contaminant's analytical detection limit (ADL) as defined by USEPA Publication SW-846, then the SW-846 ADL shall be used as the clean standard.
- 8. General Electric shall provide documentation showing that the laboratory chosen for sample analysis has a QA/QC plan for the use of SW-846 methods. All laboratory analyses shall be performed using SW-846 (3rd Edition) methods. The company shall indicate the specific method to be used for analysis of each hazardous waste consitutent stored in the hazardous waste management unit.
- 9. Soils found to be contaminated with hazardous organic constituents above their analytical detection limit, as defined by USEPA Publication SW-846, shall be managed as hazardous waste. Soils shall be considered clean when testing reveals no detectable hazardous organic constituents in the soils. General Electric shall revise the closure plan to indicate that soil testing will be performed and provide plans for taking soil samples, determining the horizontal and vertical extent of contamination (if needed) and preparing for the contingency that would require removal of contaminated soils.
- 10. Rinseate and soil sampling parameters shall also include those for radioactivity. General Electric shall determine the appropriate type of sampling procedures and acceptable "clean" levels for these parameters through correspondence with the NRC.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carri Date 2-21-53

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

October 27, 1988

Re: GE/Ravenna Lamp Plant

U.S. EPA ID No.: 0HD059061317 Ohio Permit No.: 02-67-0158

Closure Plan

GE/Ravenna Lamp Plant Attn: James Mazella 6800 N. Chestnut Street Ravenna, Ohio 44266-3902

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for GE/Ravenna Lamp Plant located at 6800 N. Chestnut Street, Ravenna, Ohio 44266-3902 will appear the week of October 24, 1988, in The Record Courier, Ravenna, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, December 1, 1988.

Copies of the closure plan will be available for public review at the Reed Memorial Library, 167 E. Main Street, Ravenna, Ohio 44266 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 644-2934, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager Data Management Section

Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V Randy Meyer, Ohio EPA, DSHWM, TA&ES Mark Bergman, Ohio EPA, DSHWM, NEDO

Momas E. Crepeau

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RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: GE/Ravenna Lamp Plant, 6800 N. Chestnut Street, Ravenna, Ohio 44266-3902, U.S. EPA ID No.: OHD059061317, Ohio Permit No.: 02-67-0158. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for drum storage for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Reed Memorial Library, 167 E. Main Street, Ravenna, Ohio 44266 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.





OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Discharge Production Department— Ravenna Lamp Plant General Electric Company 6800 N. Chestnut St., Ravenna, OH 44266 216 297-0861

September 8, 1988

Ms. Rebecca Strom
United States Environmental Protection Agency
Region V
14th Floor
230 S. Dearborn Street
Chicago, IL 60604

RE: CONTAINER STORAGE CLOSURE PLAN GENERAL ELECTRIC COMPANY RAVENNA LAMP PLANT

Dear Ms. Strom:

Enclosed is a copy of a closure plan for the closure of a drum storage unit located at the plant. The plan is submitted to satisfy 40 CFR 265.112(c) and OAC 3745-66-12(c) concerning closure of a hazardous waste management unit.

If you have any questions regarding the contents of this plan, please contact Mr. James Magella at $(216)\ 297-0861$.

Sincerely yours,

C.D. Hanson, General Manager Discharge Production Department

JM:sh 4685F

GENERAL ELECTRIC COMPANY

RAVENNA LAMP PLANT RAVENNA, OHIO

RCRA MODIFIED CLOSURE PLAN EPA IDENTIFICATION NO. OHD 059 061 317

KILLAM PROJECT NO. 2G018

JUNE 1990

Prepared By:

KILLAM ASSOCIATES, DLA DIVISION
100 Allegheny Drive
Warrendale, Pennsylvania 15086
(412) 772-0200

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CERTIFICATION

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GENERAL ELECTRIC COMPANY RAVENNA LAMP PLANT

RCRA MODIFIED CLOSURE PLAN

INTRODUCTION

THE ORIGINAL RCRA CLOSURE PLAN FOR THE RAVENNA LAMP PLANT WAS APPROVED BY THE OHIO EPA ON JULY 12, 1989. ON WEDNESDAY, DECEMBER 13, 1989, THE APPROVED CLOSURE PLAN FOR THE HAZARDOUS WASTE DRUM STORAGE PAD WAS IMPLEMENTED. AT THAT TIME, THE 12' X 12' STORAGE PAD WAS PRESSURE WASHED AND RINSED, AND A REPRESENTATIVE SAMPLE OF THE FINAL RINSE WAS COLLECTED TO DETERMINE THE ADEQUACY OF CLOSURE. DUE TO HIGH ALCOHOL LEVELS, THE PAD WAS RECLEANED ON MAY 2, 1990. REPRESENTATIVE SAMPLES WERE AGAIN COLLECTED AND THE RESULTS ARE ATTACHED.

THE SUMMARY OF ANALYTICAL RESULTS FOR THE DRUM STORAGE AREA ARE LISTED IN TABLE I. ONLY ONE CONSTITUENT, TRICHLOROETHYLENE (3.3 UG/L) WAS DETECTED IN THE RINSEATE DURING THE LAST DECONTAMINATION TESTING. BASED ON LOW LEVELS OF TRICHLOROETHYLENE PRESENT IN RINSEWATER, AND THE FACT THAT IT IS PRESENT IN A FIELD BLANK AND THE RINSING WATER ITSELF, THE CLEAN LEVEL FOR TRICHLOROETHYLENE IS BEING REVISED FROM ANALYTICAL DETECTION LIMITS (ADL) TO .005 MG/L. APPROVAL OF THIS LEVEL WILL ALLOW CURRENT CONDITIONS TO BE CONSIDERED CLEAN.

ALSO INVOLVED IN THE CLOSURE WAS THE CLEANING AND RINSING OF A SIX INCH DRAIN LINE CONNECTED TO THE STORAGE PAD. CLOSURE OF THIS DRAIN LINE WAS TO INCLUDE THE PRESSURE TESTING OF THE LINE TO DETERMINE ITS STRUCTURAL INTEGRITY PRIOR TO CLEANING AND RINSING.

BEFORE PRESSURE TESTING OF THE LINE WAS TO BEGIN, HOWEVER, A BACKHOE WAS USED TO EXCAVATE NEAR THE DRAIN IN ORDER TO EXPOSE IT AND IDENTIFY THE MATERIAL OF CONSTRUCTION. THE DRAIN LINE WAS DISCOVERED TO CONSIST OF SIX FOOT TERRA-COTTA SECTIONS IMBEDDED IN A BLACKISH COLORED SAND. THE DRAIN LINE APPEARED TO BE CLOGGED.

DURING THE EXCAVATION, THE PIPE WAS BROKEN AND SEVERAL GALLONS OF WHAT APPEARED TO BE BUTYL ACETATE WAS FOUND TO HAVE COLLECTED IN THE TRENCH EXCAVATION. SINCE THE DRAIN LINE DID NOT APPEAR TO BE AIR-TIGHT, PRESSURE TESTING WAS NOT CONDUCTED. THE RELEASED LIQUID WAS PUMPED INTO A 55 GALLON DRUM AND SAMPLED. THE RESULTS ARE LISTED IN TABLE 2.

ON FEBRUARY 6 AND 7, 1990, A PROFESSIONAL ENGINEER FROM KILLAM ASSOCIATES SUPERVISED THE EXCAVATION OF THE TRENCH FROM THE BUILDING TO THE CONCRETE DRIVE. THIS WAS DONE TO UNCOVER THE CLOGGED AND BROKEN SIX-INCH TERRA-COTTA DRAIN PIPE. THE PIPE WAS EXCAVATED TO ASSURE NO FURTHER LIQUID WAS IN THE PIPE AND TO REMOVE THE PIPE AND ANY POTENTIALLY CONTAMINATED SOILS. A CLOG WAS DISCOVERED APPROXIMATELY 25 FEET FROM THE OUTLET FROM THE BUILDING (SEE FIGURE 4). ADDITIONAL LIQUID WAS FOUND IN THE PIPE. THIS FLUID WAS REMOVED AND PLACED INTO AN 80 GALLON DRUM.

ALL EXCAVATED SOILS WERE PLACED INTO ONE OF TWO CATEGORIES: 1) ABOVE THE PIPE BY A MINIMUM OF TWO FEET AND 2) WITHIN TWO FEET ABOVE THE PIPE AND SOILS BELOW THE PIPE. ALL SOILS FROM THE FIRST CATEGORY WERE STOCKPILED ON A SHEET PLASTIC AND COVERED. ALL SOILS FROM THE SECOND CATEGORY WERE PLACED IN LINED AND COVERED 20 CUBIC YARD ROLL-OFF BOXES.

TWO COMPOSITE SAMPLES WERE TAKEN FROM EACH OF THE THREE 20 CY BOXES AND THE STOCKPILE AT AN APPROXIMATE RATE OF ONE COMPOSITE SAMPLE PER 10 CY AS SUGGESTED BY PAUL VANDERMEER OF THE OEPA.

TABLE 3 LISTS THE PARAMETERS FROM EACH COMPOSITE SAMPLE AND THE DETECTION LIMITS. ALL FOUR SOURCES (BOX 2083, 2079, 12, AND THE STOCKPILE) INDICATE A DETECTABLE AMOUNT OF ACETONE BUT AS IS STATED, THE LAB BLANKS CONTAINED 80 AND 100 UG/L OF ACETONE. THE ACETONE WAS FROM THE LAB EQUIPMENT AND CAN BE DISCOUNTED. TRICHLOROETHYLENE WAS DETECTED IN THE

TCLP EXTRACT FROM THE SOILS CONTAINED IN BOX 2083. THIS SOIL WILL BE DISPOSED IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS.

A MODIFIED CLOSURE PLAN HAS BEEN PREPARED TO MORE THOROUGHLY ADDRESS THE CLOSURE OF THE DRAINAGE SYSTEM. ANALYTICAL RESULTS FROM IMPLEMENTATION OF THE APPROVED CLOSURE PLAN AND UNANTICIPATED SITE CONDITIONS WARRANT MODIFICATION OF THE APPROVED PLAN. TO ADDRESS THESE ISSUES, THE FOLLOWING SECTIONS OF THE APPROVED CLOSURE PLAN HAVE BEEN MODIFIED:

SECTION VI - SCHEDULE FOR CLOSURE

SECTION VII - AIR EMISSIONS

SECTION IX - DECONTAMINATION PROCEDURES

SECTION X - CLEAN LEVELS FOR SOILS

SECTION XI - SAMPLING PLAN AND ANALYTICAL METHODS FOR SOIL SAMPLING

SECTION XII - REMOVAL EFFORTS FOR CONTAMINATED SOILS

FOR COMPLETENESS AND CLARITY, THE APPROVED CLOSURE PLAN WAS MODIFIED FOR THIS SUBMITTAL. ALL MODIFIED SECTIONS OF THE APPROVED PLAN APPEAR IN CAPITAL LETTERS.

GENERAL ELECTRIC COMPANY RAVENNA LAMP PLANT

RCRA CLOSURE PLAN

I. DESCRIPTION OF FACILITY

A. Owner/Operator Identification

General Electric Company Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, OH 44266-3902

Telephone: 216/297-0861 Contact: James Magella

B. Facility EPA Identification Number: OHD 059 061 317

C. <u>Facility Description</u>

The Ravenna Lamp Plant is engaged in the production of energy efficient, high-intensity, discharge lamps. These include mercury, multi-vapor, and lucalox lamps. Approximately 480 people are employed at the facility.

II. DESCRIPTION OF MANAGEMENT UNIT TO BE CLOSED

A. Drum Storage Unit

The "interim status" hazardous waste storage unit (Part A Permit Application, Form 3, Page 1, Line 1) at the plant consists of a container storage unit in use from the early 1980's. Hazardous wastes stored within this unit were generated on site and were stored only in closed 55-gallon containers.

The storage unit is located in the northwest corner of the plant (Figure 1) in an enclosed cinder block wall room. unit consists of 144 square feet of concrete floor sloping inwards away from all points of egress. The concrete storage pad is in sound structural condition and does not contain cracks extending through the entire concrete depth. floor drains are located in the storage unit. Three drains are located at the entrances to the unit, and two are located in the center of the storage and process area. The drains are shown in Figure 2. The drains exit the building as shown in Figure 1 and connect to a storm sewer located west of the plant. The storm sewer discharges to the NPDES outfall (NPDES Permit No. F322 BD). This outfall is permitted to discharge the non-contact cooling water used at the plant. discharged at this location enters a drainage ditch which flows outside of the northern plant property line. All floor drains in the unit were plugged in January, 1989.

B. Wastes

Waste Name	$\underline{\text{EPA Identification Code(s)}}$
Trichloroethylene Acetone Methanol Butyl acetate Denatured alcohol Petroleum oil Waste stoddard solvent Mixed radioactive/flammabl wastes (thorium/alcohol)	

III. FACILITY MAP

- A. The Ravenna Lamp Plant is located on the Ravenna Quadrangle, Ohio--Portage County issued by U. S. Geological Survey, Reston, Virginia 22092 (Figure 3).
 - Latitude 41 degrees, 10 minutes, 52 seconds (N)
 - Longitude 81 degrees, 14 minutes, 00 seconds (W)
- B. The Ravenna Lamp Plant is located at 6800 N. Chestnut Street (Figure 1).

IV. FACILITY DRAWINGS

A drawing of the drum storage unit is given in Figure 2.

V. HAZARDOUS WASTE IDENTIFICATION

The following types and quantities of hazardous wastes were stored on site:

<u>Waste Name</u>	EPA Identification Code(s)	Maximum Inventory (Drums)
Trichloroethylene Acetone Methanol Butyl acetate Denatured alcohol Petroleum oil Waste stoddard solve Mixed radioactive/	F001, U228 F003, U002 F005, U154 D001 D001 D001 D001	8 3 4 10 8 8 2
flammable wastes (thorium/alcohol)	D001	2

VI. SCHEDULE FOR CLOSURE

	Activity	Number of Days Following Closure Plan Approval
1.	Removal of Inventory	0 - 30
2.	Mobilization	0 - 90
3.	Decontamination/Rinse	15 - 90
4.	Disposal of Residual Waste	15 - 120
5.	Certification of Closure	15 - 180

NOTE: An independent, registered, professional engineer will certify closure following completion of closure activities. The engineer will be present during all sampling activities.

VII. AIR EMISSIONS

No contingencies are made for minimizing air emissions related to the closure of the drum storage unit. It is not anticipated that closure activities will generate air emissions which would have any significant adverse impact on either attainment or maintenance of ambient air quality standards within the Ambient Air Quality Control Region. Air emissions will consist primarily of water vapor resultant from the high-pressure washing process being employed within the confines of the building.

REMOVAL OF THE SOIL ONSITE COULD CREATE SOME ASSOCIATIVE DUST. DEPENDING UPON ONSITE CONDITIONS. APPROPRIATE MEASURES WILL BE TAKEN TO MINIMIZE OR ELIMINATE DUST DURING REMOVAL OPERATIONS, INCLUDING PERSONAL SAFETY EQUIPMENT AS REQUIRED.

VIII. PERSONNEL SAFETY AND FIRE PREVENTION

All closure and decontamination activities will be performed by an experienced hazardous waste contractor licensed for work in Ohio. A site-specific health and safety plan is attached in the appendix.

IX. DECONTAMINATION PROCEDURES

A. Storage Pad

Prior to decontamination, General Electric will inspect the concrete pad to determine the extent and depth of any cracks in the pad. If cracks are continuous through the depth of the concrete, the crack will be temporarily sealed with an epoxy sealant. In addition to sealing the cracks, the plugs in the floor drains will be checked to assure their watertightness.

Decontamination of facility surfaces (walls and floors in area) will be accomplished by high-pressure washing with a water-based solution containing approximately 2 to 3 percent concentration of a trisodium phosphate detergent. Application of the wash solution will vary between 1,500 and 3,000 psi depending on structural integrity of the surface being washed. Once applied to floor surfaces in the area, the wash solution will soak for a minimum of 30 minutes to allow for removal of contaminants in high traffic areas. Residual wash solution will then be collected via vacuum and transferred An estimated 100 gallons of rinseate into 55-gallon drums. will be generated. Application of two rinses will be done for the removal of residual wash solutions. Rinse solutions will be collected and handled in the same manner as the preceding wash solution.

Following the completion of the second rinse, representative samples will be collected and analyzed for the following parameters:

Parameter	SW-846 Test Method	<u>Clean Level</u>
TRICHLOROETHYLENE	8010	0.005 MG/L
Acetone	8015	1 mg/l
Methanol	8015	1 mg/l
Alcohol	8015	1 mg/l
Ignitability	1010	Greater than 140°F

Facility rinsing and collection and analysis of samples will continue until levels of each parameter are found below clean levels listed above. Rinseate containing constituent levels above these limits will be disposed of as a hazardous waste at a permitted hazardous waste disposal facility OR IN ACCORDANCE WITH APPLICABLE STATE, LOCAL, AND FEDERAL LAWS.

In addition to the analytical testing listed above, two additional tests will be performed to determine the presence of thorium in the unit. Ten representative smear samples will be collected on and adjacent to the concrete storage area. Six samples will be collected within the unit, two samples will be collected in the adjacent solvent storage area, and two samples will be collected in the corridor outside of the storage area. Additional decontamination efforts will be required if the results of the smear samples exceed the "clean level" below.

Rinseate containing natural thorium levels above the "clean level" will be filtered prior to disposal in order to remove the thorium.

Samp	le

Clean Level

Smear sample Rinseate sample 200 dpm/100 cm² 6 X 10⁻⁵ uCi/m1

B. Drain System

Following completion of the concrete storage pad decontamination, the drain system in the storage unit will be decontaminated. The plugs will be removed from the drains located in the storage unit, and the drains and associated piping will be thoroughly rinsed. Rinsewater will be collected at the END OF THE SIX-INCH METAL PIPE THAT TERMINATES ABOUT FOUR-FEET OUTSIDE THE BUILDING LOCATED IN THE TRENCH (SEE FIGURE 4). AN ESTIMATED 50 GALLONS OF RINSEATE WILL BE GENERATED.

THE REMAINDER OF THE SIX-INCH DRAIN SYSTEM (BETWEEN THE BUILDING AND CONCRETE DRIVE, APPROXIMATELY 120 FEET NORTH OF THE BUILDING AND JUST SHORT OF THE MANHOLE #1, SEE FIGURE 4), WILL ALSO BE SAMPLED. THE TERRA-COTTA DRAIN LINE WILL BE RINSED UNDER LOW PRESSURE. THE RINSEWATER WILL BE COLLECTED AT THE NORTHEND OF THE PIPE LOCATED IN THE EXCAVATION JUST SHORT OF MANHOLE #1. AN ESTIMATED 100 GALLONS OF RINSEATE WILL BE GENERATED.

BOTH SECTIONS OF THE DRAIN SYSTEM WILL BE FLUSHED UNTIL THE CONCENTRATION OF THE PARAMETERS, LISTED IN SECTION IX.A ARE BELOW THE CLEAN LEVELS. THE RINSEATE WILL BE DISPOSED IN AN ENVIRONMENTALLY ACCEPTABLE MANNER COMPLYING WITH ALL LOCAL, STATE, AND FEDERAL LAWS.

X. CLEAN LEVELS FOR SOILS

TO DETERMINE IF THE EXCAVATED MATERIAL MEETS THE CLEAN LEVELS ESTABLISHED BELOW, SAMPLES WILL BE COLLECTED AT FIVE SEPARATE LOCATIONS (SEE FIGURE 4). AT EACH LOCATION, TWO DISCRETE SAMPLES WILL BE TAKEN AND ANALYZED FOR THE PARAMETERS LISTED BELOW. AN ADDITIONAL SAMPLING LOCATION WILL BE DEVELOPED AT MANHOLE #1.

IF THE RESULTS FROM THE SAMPLE COLLECTED AT MANHOLE #1 AND THE SAMPLE AT THE SOUTHERN END OF THE CONCRETE DRIVE INDICATE NO CONTAMINATION, THIS PORTION WILL BE CONSIDERED CLOSED.

THE REMAINING PORTION OF THE DRAIN SYSTEM BETWEEN MANHOLE #1 AND #2 WILL BE DECONTAMINATED AS DESCRIBED IN THE PRECEDING SECTION. IF THE RINSEATE IS ABOVE CLEAN LEVELS AND/OR THERE IS A LOSS OF WATER THROUGH THE PIPE DURING RINSING OPERATION, THEN THE POSSIBILITY THAT SOIL CONTAMINATION HAS OCCURRED MAY EXIST.

SAMPLES BENEATH THE DRAIN SYSTEM WILL BE COLLECTED AT A DEPTH OF O TO 6 INCHES, 6 TO 12 INCHES, AND 12 TO 18 INCHES. ALL SAMPLES WILL BE DISCRETE AND NOT COMPOSITED. ALL SAMPLES WILL BE ANALYZED FOR THE FOLLOWING PARAMETERS:

<u>Parameter</u>	SW-846 Test Method	<u>Clean Level</u>
Acetone	8015	Analytical Detection Limit
Ignitability	· 1010	Greater than 140 ⁰ F
Methanol	8015	Analytical Detection Limit
Trichloroethylene	8010	Analytical Detection Limit
METHYLENE CHLORIDE	8240	ANALYTICAL DETECTION LIMIT
n-BUTYL ACETATE	8015	ANALYTICAL DETECTION LIMIT

XI. SAMPLING PLAN AND ANALYTICAL METHODS FOR SOIL SAMPLING

SAMPLES WILL BE COLLECTED TO DETERMINE THE POSSIBLE EXTENT OF ANY SOIL CONTAMINATION AT THE PLANT. ALL SAMPLES WILL BE COLLECTED IN ACCORDANCE WITH SW-846 FIELD SAMPLING TECHNIQUES.

IF NEEDED, SAMPLING OF SOILS BENEATH THE SIX-INCH DRAIN LINE WILL BE FIRST CONDUCTED WITH A BACKHOE TO EXPOSE THE SOIL BENEATH THE PIPING. ONCE THE APPROPRIATE SAMPLING DEPTH IS REACHED, THE SAMPLES WILL BE MANUALLY COLLECTED USING A STAINLESS STEEL SPATULA OR SCOOP. THE SAMPLER WILL WEAR PROTECTIVE RUBBER GLOVES. AFTER EACH SAMPLE IS TAKEN, THE STAINLESS STEEL INSTRUMENT WILL BE WASHED WITH SOLUTION OF ALCONOX (OR OTHER APPROPRIATE CLEANER) AND WATER AND THEN THOROUGHLY RINSED WITH DISTILLED WATER, SO AS TO AVOID CONTAMINATION OF SAMPLES. ALL SAMPLES COLLECTED WILL BE DISCRETE AND NOT COMPOSITED. ANALYTICAL METHOS WILL BE THOSE LISTED IN SECTION X ABOVE.

AS OF THIS TIME, THE LABORATORY TO PERFORM THE ANALYTICAL WORK HAS NOT BEEN CHOSEN. WHEN A LABORATORY IS CHOSEN, GENERAL ELECTRIC WILL PROVIDE DOCUMENTATION SHOWING THAT THE LABORATORY HAS A QA/QC PLAN FOR THE USE OF SW-846 METHODS. THIS INFORMATION WILL BE PROVIDED TO THE OEPA BEFORE THE COMMENCEMENT OF CLOSURE ACTIVITIES.

XII. REMOVAL EFFORTS FOR CONTAMINATED SOILS

SOILS FOUND TO BE CONTAMINATED IN ACCORDANCE WITH SECTION X ABOVE WILL BE REMOVED AND MANAGED AS HAZARDOUS WASTES. SOILS WILL BE EXCAVATED WITH A BACKHOE AND TRANSFERRED DIRECTLY TO A LINED ROLL OFF CONTAINER, FOR DISPOSAL AT A PERMITTED HAZARDOUS WASTE DISPOSAL FACILITY. CARE WILL BE TAKEN TO ELIMINATE THE DISPERSION OF CONTAMINATED SOILS BEYOND THE EXCAVATION AREA AND TRUCK LOADING AREA. UPON COMPLETION OF SOIL REMOVAL ACTIVITIES, THE EXCAVATED AREAS WILL BE BACKFILLED WITH CLEAN SOILS LOCATED ADJACENT TO OR ON THE PLANT PROPERTY.

XIII. LANDFILL CLOSURE PROCEDURES

Not applicable. Closure activities described herein are related to the closure of drum storage unit. Landfill activities have not been conducted at this site.

XIV. EQUIPMENT DECONTAMINATION

EQUIPMENT UTILIZED IN OR CONTAMINATED AS A RESULT OF CLOSURE ACTIVITIES WILL EITHER BE DETERMINED EXPENDABLE AND THEREFORE WILL BE DISPOSED OR BE DECONTAMINED BY THE SAME PROCEDURES UTILIZED TO DECONTAMINATE FACILITY SURFACES (HIGH-PRESSURE WASHING WITH WATER). EQUIPMENT, INCLUDING THE BACKHOE, WILL BE RINSED IN AN APPROPRIATE MANNER PRIOR TO REMOVAL FROM THE DECONTAMINATION ZONE.

XV. <u>CERTIFICATION</u>

Upon implementation of the closure plan and certification of the completion of the closure plan by an independent, registered professional engineer, the responsible corporate officer will execute the certification enclosed.

XVI. FACILITY STATUS FOLLOWING CLOSURE

Following closure of the drum storage unit, the unit will operate as a less than 90-day accumulation facility.

XVII. CLOSURE REGULATIONS

This closure plan has been developed in accordance with 40 CFR 265 and OAC 3745-66. Copies of this closure plan have been forwarded to:

Mr. Thomas Crepeau (3 copies)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
P. O. Box 1049
Columbus, OH 43266-0149

Ms. Andrea Dakoski (1 copy)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
2110 E. Aurora Road
Twinsburg, OH 44087

Ms. Lisa Pierard (1 copy)
Chief, Waste Management Division
Technical Program Section, Ohio Unit
United States Environmental Protection Agency
Region V
14th Floor
230 S. Dearborn Street
Chicago, IL 60604

CERTIFICATION

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

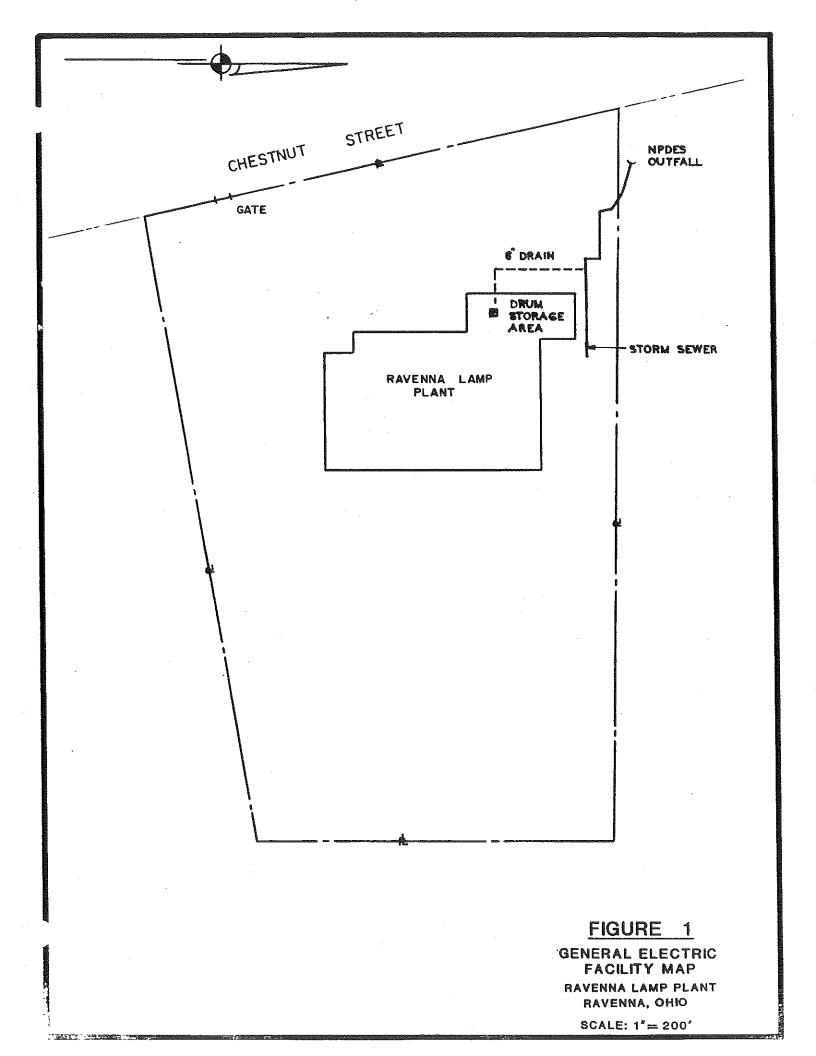
I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

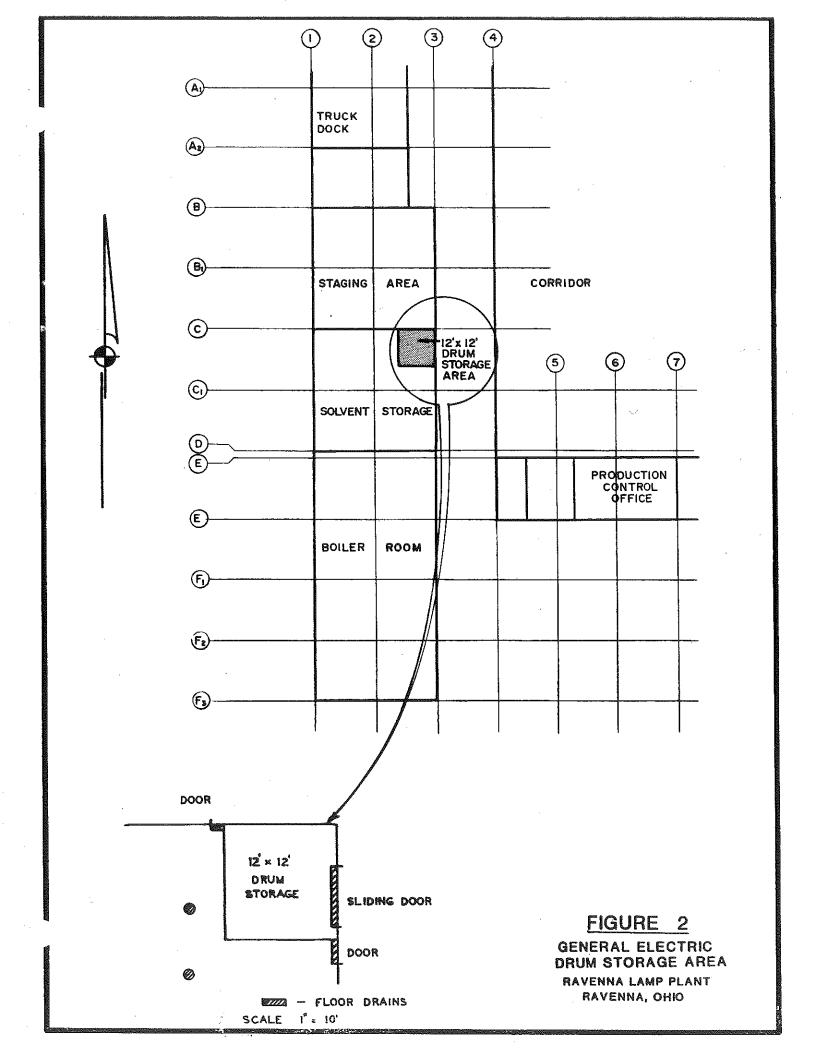
GENERAL ELECTRIC COMPANY

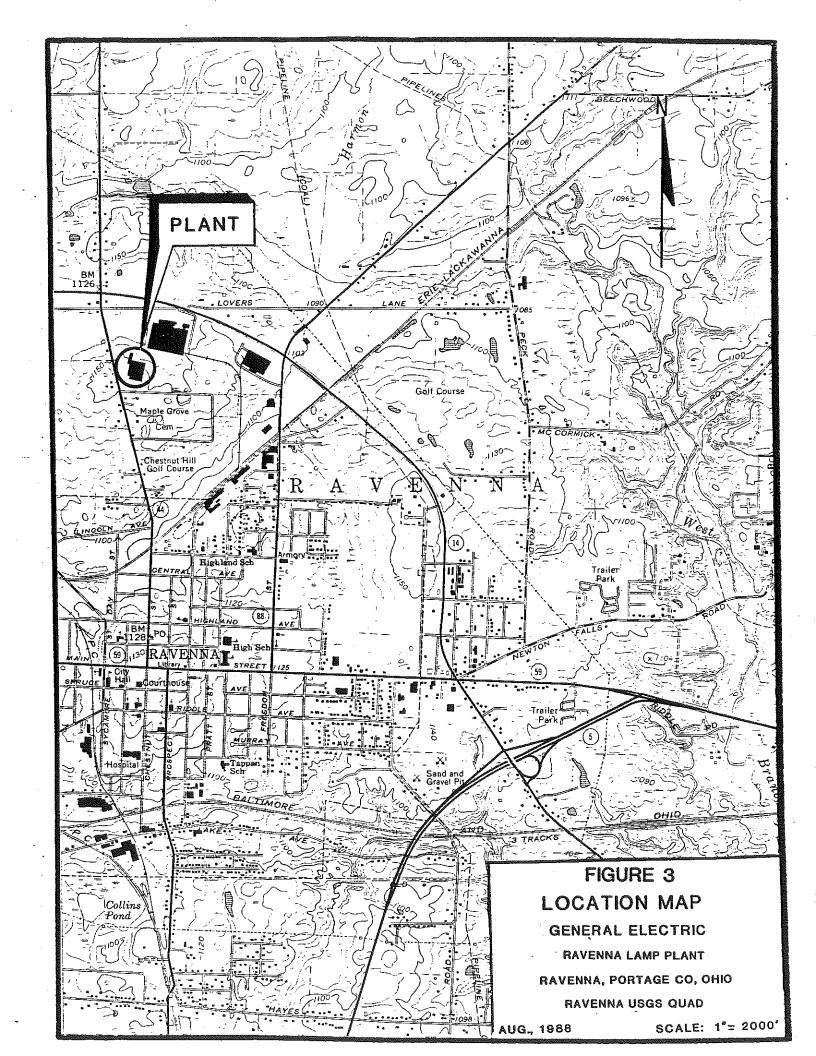
Dave Hanson Department General Manager Ravenna Lamp Plant

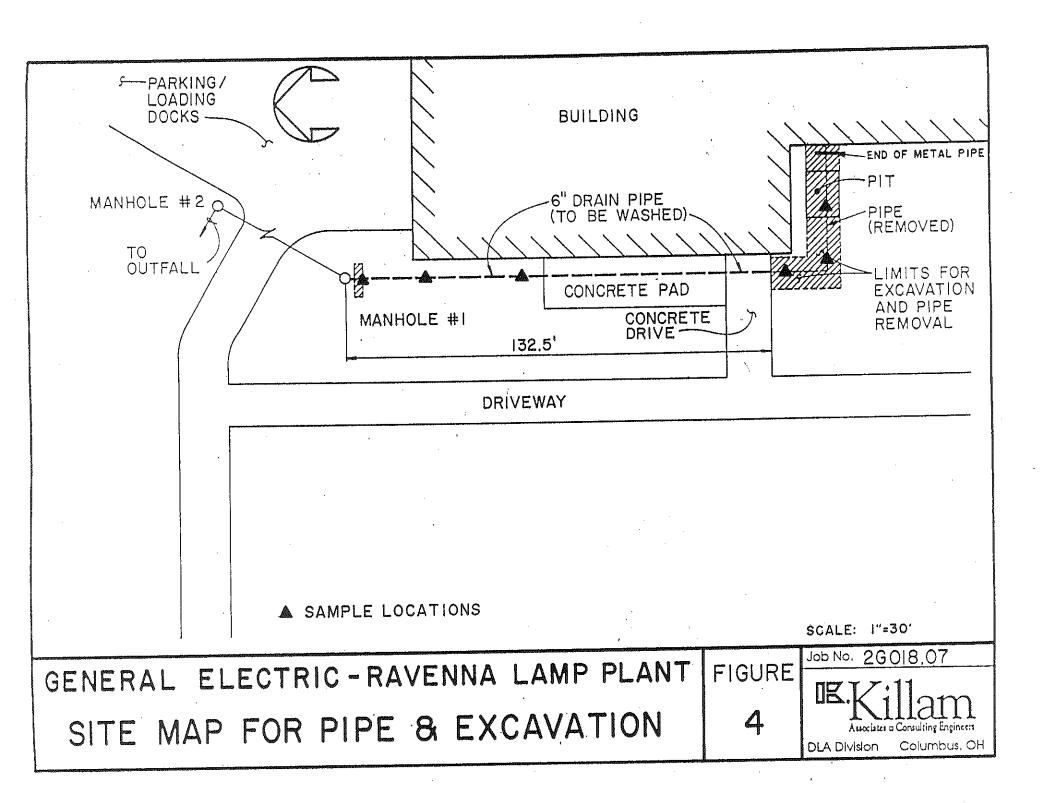
Date

FIGURES









TABLES

TABLE 1

RAVENNA LAMP PLANT

Approved July 12, 1990 Cleaned Dec. 1989 Recleaned May 1990

		CLEAN								May 1990	
PARAMETER	UNITS	LEVEL	BLANK	RINSE	WASH	Soil 1a	Soil 1b	Soil 1c	BLANK	RINSE	HOSE
Ignitability	٥F	<140	Neg	Neg	Neg						
Acetone	mg/l	1	<1.0	<1.0	<1.0						
Alcohol	mg/l	1	ND	5	1.4				ND	ND	ND
Methanol	mg/l	1	ND	ND	ND				<0.1	<0.1	<0.1
Trichloroethylene	mg/l	ADL	0.0003	0.0037	0.0135				0.0019	0.0033	0.0024
SOILS											
Ignitability	oF.	<140	Neg	Neg	Neg	Neg	Neg	Neg			
Acetone	mg/l	1	<1.0			ND	ND	ND			
Methanol	mg/l	1	<1.0			7.1	7.1	3.5			
Trichloroethylene	mg/l	ADL	0.0003			0.71	0.1	0.1			

ND - NOT DETECTED
ADL - ANALYTICAL DETECTION LIMIT

TABLE 2 - TRENCH LIQUID (12/13/89)

<u>Parameter</u>	<u>Units</u>	Result	Detection Limit
Ignitability	$\circ_{\mathbf{F}}$	Neg	N/A
Methanol	mg/1	<100	100
Ethanol	mg/l	<100	100
Acetone	mg/l	<100	100
Methylene Chloride	mg/l	1050	.0001
Trichloroethylene	mg/l	5150	.0001

TABLE 3 - TRENCH SOILS 2/6 AND 7/90

RAVENNA LARP PLANT SOIL ANALYSIS

		UNITS	ן מן	TECTION	I	BOX	2083	BOX	2079	80X	12	STOCKPILE	PILE
<i>*</i>	 			INITS		#1A	\$18	-1A	118	#1A	#18	#1A	\$1B
TRICHLOROETHYLENE	 	ug/1		5	1	17	· 10	ND	ND	ΝD	NO	NO	 OH
ACETONE *	1	ug/l		50	1	74	64	98	NO	96	110	84	110
NETHYLENE CHLORIDE		ug/1	1	5	1	ND	МО	NB		NO I	ND	NO	NO
METHANOL		mg/1	1	0.5		HO	HD	ND	HO	NO NO	ND	NO	₩D
n-BUTHYL ACETATE	1	mg/1		1		NO.	ND	ND	WO	HO	KD	ND ND	NO

ND (NONE DETECTED)

*MOTE LAB BLANKS INDICATED 80 AND 100 ug/l

APPENDIX

SITE SAFETY PLAN

SITE SAFETY PLAN

Α.	GENERAL INFOR	MATION					
	SITE:	General Ele Ravenna Lan	ectric Compar np Plant	ıy	DLA PRO	JECT NO.:	2G018.07
	LOCATION:	Portage Cou	unty, Ohio				
	PREPARED BY:	Scott A. Ne	esbit (DLA)		DATE:	February,	1989
	OBJECTIVE: Clean closure of a drum storage unit located within the plant property						
	PROPOSED DATE	PROPOSED DATE(S) OF INVESTIGATION/WORK: Spring/Summer, 1989					
BACKGROUND REVIEW: Complete Preliminary X							
	DOCUMENTATION	DOCUMENTATION/SUMMARY:					
	OVERALL		rious M	•			
		Lo	w <u>X</u> U	nknown			
	high-in for st product	cility is tensity disc orage of sm s. Small am	engaged in harge lamps. all quantiticounts of low during the	The dr es of in -level r	rum stor ndustria radioact	age unit 1 solvents ive mater	was used and waste
В.	SITE/WASTE C	HARACTERISTI	<u>CS</u>				
	WASTE T	YPE(S):	Liquid X	Solid _	X Slu	dge <u>X</u> (3as
	CHARACT	ERISTIC(S):	Corrosive Radioactive Toxic Unknown	X Vo	olatile		·

STATUS:

Active X Inactive ___ Unknown ___

WASTES:

Trichloroethylene

Methano1

Butyl acetate

Acetone

Denatured alcohol

Waste stoddard solvent

Petroleum oil

CHEMICAL AND TOXICITY DATA:

Trichloroethylene

PEL:

100 ppm

Absorption Routes:

Inhalation, ingestion, and skin contact

Toxic Class:

Vapor and liquid

Acute Symptoms:

Eye and nose irritation, central

nervous system, depression, liver and

kidney damage

Target Organs:

Central nervous system, eyes, nose,

liver, kidneys

Flash Point:

None

LEL:

11 percent

VP:

58 mm

Incompatibilities:

Strong caustics, chemically

active

metals

Methanol (Methyl Alcohol)

PEL:

200 ppm

Absorption Routes:

Inhalation, ingestion, and skin contact

Toxic Class:

Vapor or liquid

Acute Symptoms:

Headache, drowsiness, irregular he

beat, eye irritation, nausea, vomiting

Methanol (Methyl Alcohol) (Cont.)

Target Organs: Eyes, skin, central nervous

gastrointestinal tract

Flash Point:

52.5°F

LEL: 6.7 percent

VP: 97 mm

Incompatibilities: Strong oxidizers

Butyl Acetate

PEL: 150 ppm

Absorption Routes: Inhalation, ingestion, and skin contact

Toxic Class: Vapor or liquid

Acute Symptoms: Eye. nose, and throat irritation;

headache; drowsiness

Target Organs: Eyes, skin, respiratory system

Flash Point: 72°F

LEL: 1.7 percent

VP: 10 mm

Incompatibilities: Strong oxidizers, nitrates, alkalies,

and acids

Acetone

PEL: 750 ppm

Absorption Routes: Inhalation and skin contact

Toxic Class: Vapor or liquid

Acute Symptoms: Irritation of eyes and respiratory tract

Chronic Symptoms: Irritation of skin and respiratory

system

20F Flash Point:

LEL: 2.6 percent

VP: 266 mm

Incompatibilities: Oxidizers and acids

C. HAZARD EVALUATION

Little or no safety hazard exits at the drum storage unit. No waste materials will remain at the site prior to closure. All low-level radioactive wastes stored on site will also be removed prior to decontamination.

D. SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT:

MAP/SKETCH ATTACHED? No SITE SECURED? Yes

PERSONNEL PROTECTION:

LEVEL OF PROTECTION: A ___ B __ C __ D _X

MODIFICATIONS:

Modified Level D (wearing work clothes and work gloves with respirators readily available) will be appropriate for closure of drum storage units.

SURVEILLANCE EQUIPMENT/MATERIALS:

Photoionization detector, Geiger counter

ACTION LEVELS:

Prior to decontamination of the storage unit and any soil sampling or removal, a detailed site reconnaissance shall be conducted. At this time, radioactive levels and organic vapor concentrations will be measured in the zones. Ιf work radioactive levels in the work zone exceed 10 mrem/hr, all workers will be required to wear Level E personal protective equipment. Radiation levels less than 10 mrem/hr will require protection. All workers involved in lesser degrees of decontamination activities will be required to wear

radioactive monitoring device. The contractor performing the decontamination can designate levels of protection for his personnel provided that the levels of protection are not less than those specified above.

If organic vapor concentrations (breathing zone) the unit excavation above a11 or storage are 100 ppm. decontamination personnel will be required to work with Level C personal protective equipment. Work will continue at Level C until organic vapor concentrations fall below 100 ppm.

SPECIAL EQUIPMENT, FACILITIES, AND PROCEDURES: None

SITE ENTRY PROCEDURES: To be arranged with General Electric Company

Team Member (Major)	Responsibility
James P. Hannan (DLA)	Project Manager
Scott A. Nesbit (DLA)	Project Engineer
Donald G. Olmstead (DLA)	Safety Officer

WORK LIMITATIONS (time of day, etc.):

Work will be done during daylight hours.

CLOSURE-DERIVED MATERIAL DISPOSAL:

The contaminated materials which may be generated during closure will consist of rinseate. All rinseate generated will be properly disposed. Any contaminated soils excavated during closure will be disposed at a permitted hazardous waste disposal facility.

E. EMERGENCY INFORMATION

Emergency Contacts

DLA	Safety Officer	Donald G. Olmstead	412/931-8400
DLA	Project Manager	James P. Hannan	412/931-8400
DLA	Project Engineer	Scott A. Nesbit	412/931-8400
GE	Plant Contact	James Magella	216/297-0861

F. CONTINGENCY PLAN

The objective of the contingency plan is to minimize hazards to human health and the environment for fires, explosions, or any unplanned releases of hazardous waste into the air, soil, or surface water that may occur during the closure operation. In the event that a fire, spill, or other emergency situation develops, the project engineer will be responsible for coordinating all emergency response measures.

This person has the authority to commit all resources necessary to carry out the contingency plan. The project engineer will be Scott A. Nesbit of DLA.

1. Implementation of Contingency Plan

In case of an emergency situation, the safety officer has full authority to make the decision concerning the implementation of the contingency plan. Depending on the degree of seriousness, the following potential emergencies might call for the implementation of the contingency plan at the drum storage unit.

<u>Fire</u> - Due to the nature of the closure operation, the likelihood that a fire will occur is low. However, "clean" soils from an adjacent area maybe placed with a backhoe or front-end loader over the fire.

Explosion - Due to the nature of the closure operation, it is unlikely that an explosion will occur.

<u>Air Contamination</u> - Potential air releases are only likely to occur during soil disturbance activities such as excavation of contaminated soils.

2. Emergency Response Procedures

In the event of a non-acute emergency, the procedures listed below will be followed:

- a. Any employee discovering or causing a non-acute emergency situation must immediately contact the project engineer.
- b. The project engineer in conjunction with the G. E. personnel will assess the situation and contact the appropriate personnel to respond to the emergency situation.
- c. The project engineer in conjunction with the DLA team leader will take all necessary measures to contain the hazard and to prevent its spread to the environment.
- d. Safety measures will be taken to ensure maximum protection of emergency personnel and will include the use of appropriate protection equipment.
- e. All non-emergency personnel will be removed from the hazard area until the hazard has been contained and controlled. Personnel will assemble at the plant entrance gate until the project engineer determines that it is safe to resume work.

- f. Following containment and control of the emergency, the project engineer will assess the situation to determine if all contaminated wastes generated by the emergency personnel have been collected and disposed on site.
- g. The project engineer in conjunction with the G. E. personnel will ensure that all on-site emergency equipment is restored to full operational status by emergency personnel.
- h. The project engineer in conjunction with the G. E. personnel will investigate the cause of the emergency and will take steps to prevent the recurrence of such an incident.

SAN:mag/00241

GENERAL ELECTRIC COMPANY

RAVENNA, OHIO

RCRA CLOSURE PLAN

EPA I. D. NO. OHD 059 061 317

SEPTEMBER, 1988
(Revised MARCH, 1989)

DUNCAN, LAGNESE AND ASSOCIATES, INC. A DIVISION OF KILLAM ASSOCIATES 3185 Babcock Boulevard Pittsburgh, Pennsylvania 15237 412/931-8400

GENERAL ELECTRIC COMPANY RAVENNA LAMP PLANT

RCRA CLOSURE PLAN

I. DESCRIPTION OF FACILITY

A. Owner/Operator Identification

General Electric Company Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, OH 44266-3902

Telephone: 216/297-0861 Contact: James Magella

B. Facility EPA Identification Number: OHD 059 061 317

C. Facility Description

The Ravenna Lamp Plant is engaged in the production of energy efficient, high-intensity, discharge lamps. These include mercury, multi-vapor, and lucalox lamps. Approximately 480 people are employed at the facility.

II. DESCRIPTION OF MANAGEMENT UNIT TO BE CLOSED

A. Drum Storage Unit

The "interim status" hazardous waste storage unit (Part A Permit Application, Form 3, Page 1, Line 1) at the plant consists of a container storage unit in use from the early 1980's. Hazardous wastes stored within this unit were generated on site and were stored only in closed 55-gallon containers.

The storage unit is located in the northwest corner of the plant (Figure 1) in an enclosed cinder block wall room. unit consists of 144 square feet of concrete floor sloping inwards away from all points of egress. The concrete storage pad is in sound structural condition and does not contain cracks extending through the entire concrete depth. floor drains are located in the storage unit. Three drains are located at the entrances to the unit, and two are located in the center of the storage and process area. The drains are shown in Figure 2. The drains exit the building as shown in Figure 1 and connect to a storm sewer located west of the The storm sewer discharges to the NPDES outfall (NPDES Permit No. F322 BD). This outfall is permitted to discharge non-contact cooling water used at the plant. Water discharged at this location enters a drainage ditch which flows outside of the northern plant property line. All floor drains in the unit were plugged in January, 1989.

B. <u>Wastes</u>

Waste Name	<pre>EPA Identification Code(s)</pre>
Trichloroethylene Acetone Methanol Butyl acetate Denatured alcohol Petroleum oil Waste stoddard solvent	F001, U228 F003, U002 F005, U154 D001 D001 D001
Mixed radioactive/flammable wastes (thorium/alcohol)	D001

III. FACILITY MAP

- A. The Ravenna Lamp Plant is located on the Ravenna Quadrangle, Ohio--Portage County issued by U. S. Geological Survey, Reston, Virginia 22092 (Figure 3).
 - Latitude 41 degrees, 10 minutes, 52 seconds (N)
 - Longitude 81 degrees, 14 minutes, 00 seconds (W)
- B. The Ravenna Lamp Plant is located at 6800 N. Chestnut Street (Figure 1).

IV. FACILITY DRAWINGS

A drawing of the drum storage unit is given in Figure 2.

V. HAZARDOUS WASTE IDENTIFICATION

The following types and quantities of hazardous wastes were stored on site:

Waste Name	EPA Identification Code(s)	Maximum Inventory (Drums)
Trichloroethylene Acetone Methanol Butyl acetate Denature alcohol Petroleum oil Waste stoddard solven Mixed radioactive/ flammable wastes	F001, U228 F003, U002 F005, U154 D001 D001 D001	8 3 4 10 8 8 2
(thorium/alcohol)	D001	2

VI. SCHEDULE FOR CLOSURE

Activity	Number of Days Following Closure Plan Approval		
 Removal of Inventory Mobilization Decontamination/Rinse Disposal of Residual Waste Certification of Closure 	0 - 30 0 - 90 15 - 90 15 - 120 15 - 180		

NOTE: An independent, registered, professional engineer will certify closure following completion of closure activities. The engineer will be present during all sampling activities.

VII. AIR EMISSIONS

No contingencies are made for minimizing air emissions related to the closure of the drum storage unit. It is not anticipated that closure activities will generate air emissions which would have any significant adverse impact on either attainment or maintenance of ambient air quality standards within the Ambient Air Quality Control Region. Air emissions will consist primarily of water vapor resultant from the high-pressure washing process being employed within the confines of the building.

VIII. PERSONNEL SAFETY AND FIRE PREVENTION

All closure and decontamination activities will be performed by an experienced hazardous waste contractor licensed for work in Ohio. A site-specific health and safety plan is attached in the appendix.

IX. DECONTAMINATION PROCEDURES

A. Storage Pad

Prior to decontamination, General Electric will inspect the concrete pad to determine the extent and depth of any cracks in the pad. If cracks are continuous through the depth of the concrete, the crack will be temporarily sealed with an epoxy sealant. In addition to sealing the cracks, the plugs in the floor drains will be checked to assure their watertightness.

Decontamination of facility surfaces (walls and floors in area) will be accomplished by high-pressure washing with a water-based solution containing approximately 2 to 3 percent concentration of a trisodium phosphate detergent. Application of the wash solution will vary between 1,500 and 3,000 psi structural integrity of the surface being depending on washed. Once applied to floor surfaces in the area, the wash solution will soak for a minimum of 30 minutes to allow for removal of contaminants in high traffic areas. Residual wash solution will then be collected via vacuum and transferred into 55-gallon drums. An estimated 100 gallons of rinseate will be generated. Application of two rinses will be done for the removal of residual wash solutions. Rinse solutions will be collected and handled in the same manner as the preceding wash solution.

Following the completion of the second rinse, representative samples will be collected and analyzed for the following parameters:

•	<u>Clean Level</u>	
Trichloroethylene 8010 Analytical Detection 8015 I mg/l 1010 Greater than 140°F	n Limit	

Facility rinsing and collection and analysis of samples will continue until levels of each parameter are found below clean levels listed above. Rinseate containing constituent levels above these limits will be disposed of as a hazardous waste at a permitted hazardous waste disposal facility.

In addition to the analytical testing listed above, two additional tests will be performed to determine the presence of thorium in the unit. Ten representative smear samples will be collected on and adjacent to the concrete storage area. Six samples will be collected within the unit, two samples will be collected in the adjacent solvent storage area, and two samples will be collected in the corridor outside of the storage area. Additional decontamination efforts will be required if the results of the smear samples exceed the "clean level" below.

Rinseate containing natural thorium levels above the "clean level" will be filtered prior to disposal in order to remove the thorium.

<u>Sample</u>	<u>Clean Level</u>	
Smear sample	200 dpm/100 cm ²	
Rinseate sample	6 X 10 ⁻⁵ uCi/ml	

B. Drain System

Following completion of the concrete storage pad decontamination, the drain system in the storage unit will be decontaminated. The plugs will be removed from the drains located in the storage unit, and the drains and associated piping will be thoroughly rinsed. Rinsewater will be collected at the intersection of the six-inch underdrain and the 24-inch storm sewer (Figure 1). The drain system will be flushed until the concentration of Section IX, A. parameters

are below the clean levels. An estimated 100 gallons of rinseate will be generated. Rinseate containing constituent levels above the clean levels will be disposed as a hazardous waste at a permitted hazardous waste disposal facility.

X. CLEAN LEVELS FOR SOILS

Due to the drain system in use at the storage unit, soils located beneath the six-inch drainway and soils located downgradient of the NPDES outfall will be sampled to determine if any contamination has occurred. Samples beneath the drain system will be collected every 100 feet at a depth of 0 to 6 inches, 6 to 12 inches, and 12 to 18 inches. All samples will be discrete and not composited. All samples will be analyzed for the following parameters:

Parameter	SW-846 Test Method	Clean Level
Acetone	8015	Analytical Detection Limit
Ignitability	1010	Greater than 140°F
Methanol	8015	Analytical Detection Limit
Trichloroethylene	8010	Analytical Detection Limit

Soil samples exceeding the ADL for hazardous organic constituents shall be managed as hazardous wastes and disposed at a permitted hazardous waste disposal facility. If samples are found to be contaminated, additional samples will taken. Additional be samples will be taken at a distance of 50 feet from the original contaminated sampling locations along the flow line of the pipe or ditch and at five feet on either side of contaminated samples. These samples will be used to determine the horizontal extent of soils are Ιf contaminated contamination. 12- to 18-inch depth, additional samples will be collected at one foot intervals beneath that sample until no organic contaminants are found.

Since mixed radioactive wastes have been stored in this unit, all samples collected will be analyzed for thorium in addition to the parameters listed above. Soil samples will be considered clean when thorium concentrations in the samples are found at or below the established background limit. The background limit of 10 pCi/gm of soil will be used as the clean level for thorium. Soils found with thorium concentrations above the background limit will be disposed in accordance with NRC regulations.

XI. SAMPLING PLAN AND ANALYTICAL METHODS FOR SOIL SAMPLING

Samples collected to determine the extent of any soil contamination at the plant will be collected in accordance with SW-846 field sampling techniques. Sampling of soils beneath the six-inch drain line will first be conducted with a backhoe to expose the soil beneath the piping. Once the appropriate sampling depth is reached, the samples will be manually collected. All samples collected will be discrete and not composited. Analytical methods will be those listed in Section X above.

As of this time, the laboratory to perform the analytical work has not been chosen. When a laboratory is chosen, General Electric will provide documentation showing that the laboratory has a QA/QC plan for the use of SW-846 methods. This information will be provided to the OEPA before the commencement of closure activities.

XII. REMOVAL EFFORTS FOR CONTAMINATED SOILS

Soils found to be contaminated in accordance with Section X above will be removed and managed as hazardous wastes. Soils will be excavated with a backhoe and transferred directly to a lined truck for disposal at a permitted hazardous waste disposal facility. Care will be taken to eliminate the dispersion of contaminated soils beyond the excavation area and truck loading area. Upon

completion of soil removal activities, the excavated areas will be backfilled with clean soils located adjacent to or on the plant property.

XIII. LANDFILL CLOSURE PROCEDURES

Not applicable. Closure activities described herein are related to the closure of drum storage unit. Landfill activities have not been conducted at this site.

XIV. EQUIPMENT DECONTAMINATION

Equipment utilized in or contaminated as a result of closure activities will either be determined to be expendable and, therefore, will be disposed or decontaminated by the same procedures utilized to decontaminate facility surfaces (high-pressure washing with water). Equipment will then be rinsed in an appropriate manner prior to removal from the decontamination zone.

XV. CERTIFICATION

Upon implementation of the closure plan and certification of the completion of the closure plan by an independent, registered professional engineer, the responsible corporate officer will execute the certification enclosed.

XVI. FACILITY STATUS FOLLOWING CLOSURE

Following closure of the drum storage unit, the unit will operate as a less than 90-day accumulation facility.

XVII. CLOSURE REGULATIONS

This closure plan has been developed in accordance with 40 CFR 265

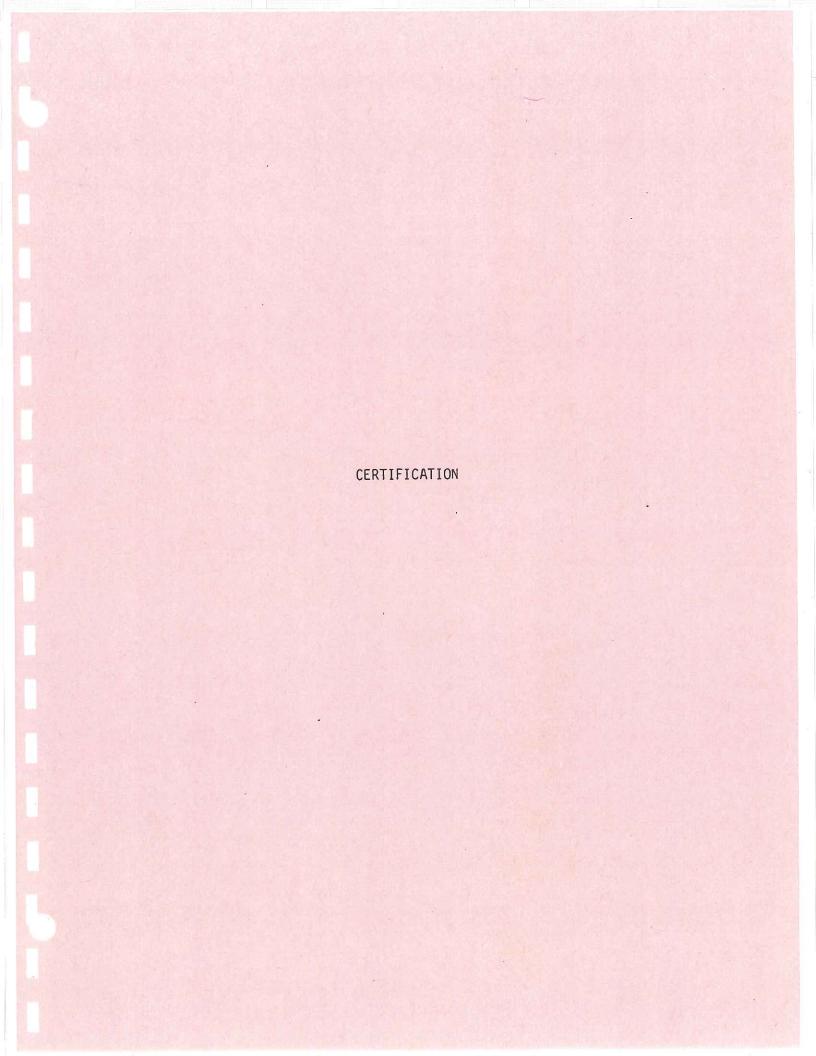
and OAC 3745-66. Copies of this closure plan have been forwarded to:

Mr. Thomas Crepeau (3 copies)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
P. O. Box 1049
Columbus, OH 43622-0149

Ms. Andrea Dakoski (1 copy)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
2110 E. Aurora Road
Twinsburg, OH 44087

Ms. Lisa Pierard (1 copy)
Chief, Waste Management Division
Technical Program Section, Ohio Unit
United States Environmental Protection Agency
Region V
14th Floor
230 S. Dearborn Street
Chicago, IL 60604

san00021



CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

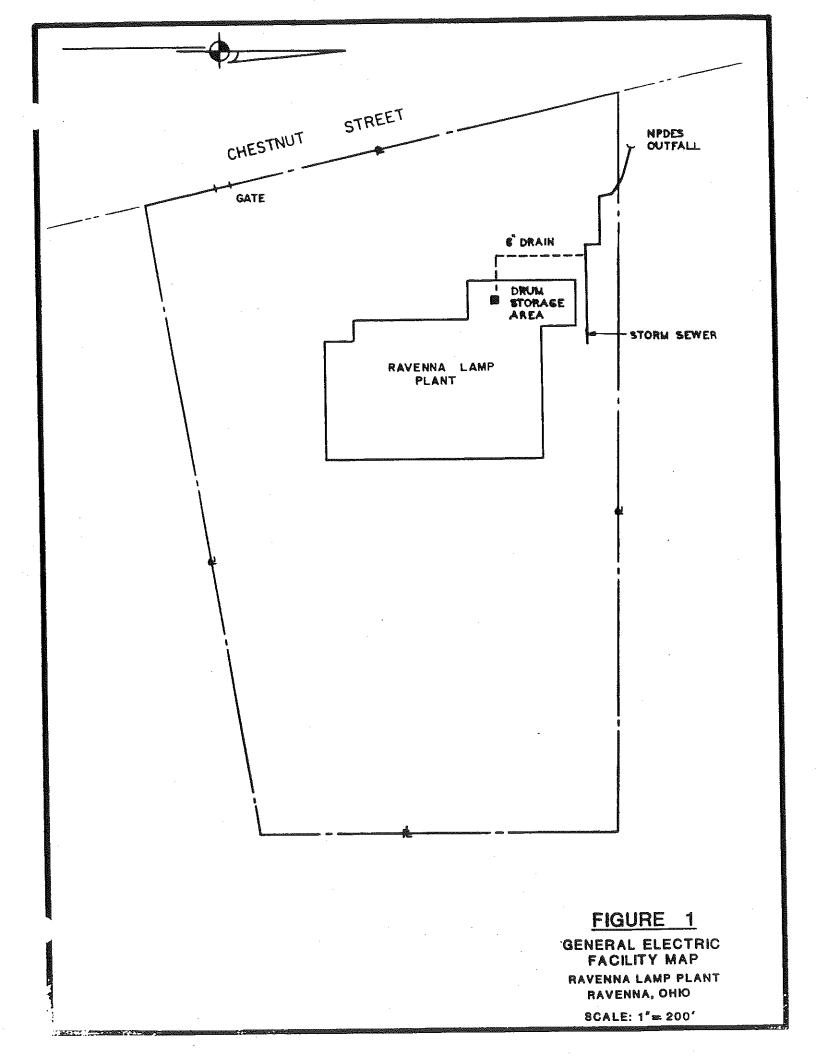
I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

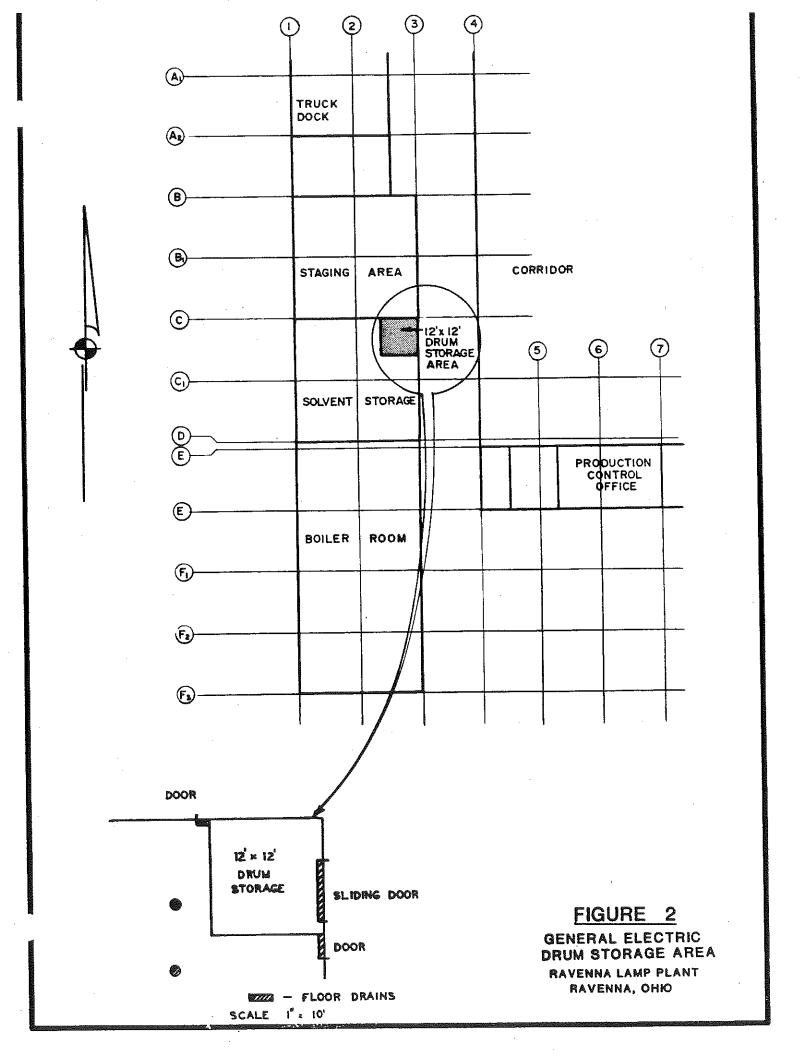
GENERAL ELECTRIC COMPANY

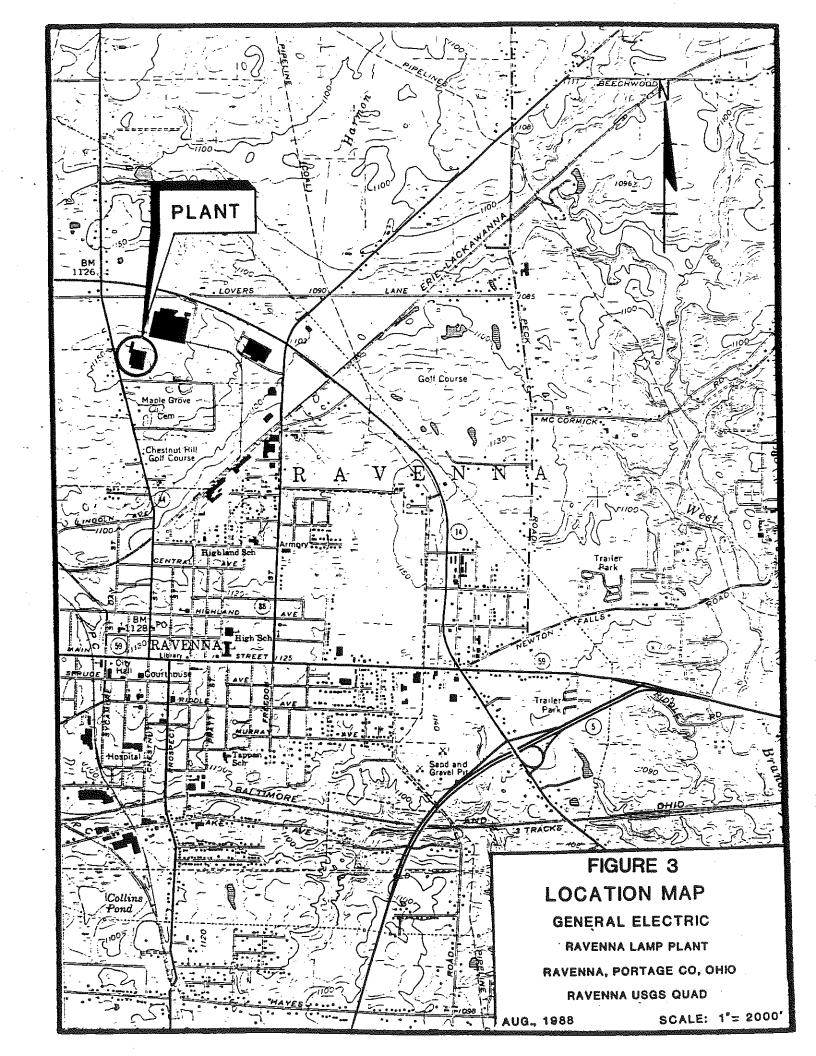
Dave Hanson Department General Manager Ravenna Lamp Plant

Date

FIGURES







APPENDIX

SITE SAFETY PLAN

SITE SAFETY PLAN

A. GENERAL INFORMATION General Electric Company DLA PROJECT NO.: 2G018.07 SITE: Ravenna Lamp Plant Portage County, Ohio LOCATION: DATE: February, 1989 PREPARED BY: Scott A. Nesbit (DLA) **OBJECTIVE:** Clean closure of a drum storage unit located within the plant property PROPOSED DATE(S) OF INVESTIGATION/WORK: Spring/Summer, 1989 BACKGROUND REVIEW: Complete Preliminary X DOCUMENTATION/SUMMARY: OVERALL HAZARD: Serious ___ Moderate ___ X Unknown FACILITY DESCRIPTION: The facility is engaged in the production of energy-efficient, high-intensity discharge lamps. The drum storage unit was used for storage of small quantities of industrial solvents and waste products. Small amounts of low-level radioactive materials have been stored on site during the past four months. B. SITE/WASTE CHARACTERISTICS Liquid X Solid X Sludge X Gas ____ WASTE TYPE(S): CHARACTERISTIC(S): Corrosive ___ Ignitable X

Radioactive X Volatile

X Reactive _____Other (Name):

Toxic

Unknown

STATUS:

Active X Inactive ___ Unknown __

WASTES:

Trichloroethylene

Methanol

Butyl acetate

Acetone

Denatured alcohol

Waste stoddard solvent

Petroleum oil

CHEMICAL AND TOXICITY DATA:

Trichloroethylene

PEL:

100 ppm

Absorption Routes:

Inhalation, ingestion, and skin contact

Toxic Class:

Vapor and liquid

Acute Symptoms:

and nose irritation, central Eye

depression, liver and nervous system,

kidney damage

Target Organs:

Central nervous system, eyes, nose,

liver, kidneys

Flash Point:

None

LEL:

11 percent

VP:

58 mm

Incompatibilities:

caustics, chemically active Strong

metals

Methanol (Methyl Alcohol)

PEL:

200 ppm

Absorption Routes:

Inhalation, ingestion, and skin contact

Toxic Class:

Vapor or liquid

Acute Symptoms:

Headache, drowsiness, irregular heart

beat, eye irritation, nausea, vomiting

Methanol (Methyl Alcohol) (Cont.)

Target Organs:

Eyes, skin, central nervous system,

gastrointestinal tract

Flash Point:

52.5°F

LEL:

6.7 percent

VP:

97 mm

Incompatibilities:

Strong oxidizers

Butyl Acetate

PEL:

150 ppm

Absorption Routes:

Inhalation, ingestion, and skin contact

Toxic Class:

Vapor or liquid

Acute Symptoms:

Eye, nose, and throat irritation;

headache; drowsiness

Target Organs:

Eyes, skin, respiratory system

Flash Point:

72°F

LEL:

1.7 percent

VP:

10 mm

Incompatibilities:

Strong oxidizers, nitrates, alkalies,

and acids

Acetone

PEL:

750 ppm

Absorption Routes:

Inhalation and skin contact

Toxic Class:

Vapor or liquid

Acute Symptoms:

Irritation of eyes and respiratory tract

Chronic Symptoms:

Irritation of skin and respiratory

system

Flash Point:

20F

LEL:

2.6 percent

VP:

266 mm

Incompatibilities: Oxidizers and acids

C. HAZARD EVALUATION

Little or no safety hazard exits at the drum storage unit. No waste materials will remain at the site prior to closure. All low-level radioactive wastes stored on site will also be removed prior to decontamination.

D. SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT:

MAP/SKETCH ATTACHED? No SITE SECURED? Yes

PERSONNEL PROTECTION:

LEVEL OF PROTECTION: A B _ C _ D X

MODIFICATIONS:

Modified Level D (wearing work clothes and work gloves with respirators readily available) will be appropriate for closure of drum storage units.

SURVEILLANCE EQUIPMENT/MATERIALS:

Photoionization detector, Geiger counter

ACTION LEVELS:

Prior to decontamination of the storage unit and any soil sampling or removal, a detailed site reconnaissance shall be conducted. At this time, radioactive levels and organic vapor concentrations will be measured in the work radioactive levels in the work zone exceed 10 mrem/hr, all workers will be required to wear Level E personal protective equipment. Radiation levels less than 10 mrem/hr will require protection. All workers involved in lesser degrees of required decontamination activities will be to wear

radioactive monitoring device. The contractor performing the decontamination can designate levels of protection for his personnel provided that the levels of protection are not less than those specified above.

If organic vapor concentrations (breathing zone) at the excavation or storage unit are above 100 ppm, all decontamination personnel will be required to work with Level C personal protective equipment. Work will continue at Level C until organic vapor concentrations fall below 100 ppm.

SPECIAL EQUIPMENT, FACILITIES, AND PROCEDURES: None

SITE ENTRY PROCEDURES: To be arranged with General Electric Company

Team Member (Major)	Responsibility
James P. Hannan (DLA)	Project Manager
Scott A. Nesbit (DLA)	Project Engineer
Donald G. Olmstead (DLA)	Safety Officer

WORK LIMITATIONS (time of day, etc.):

Work will be done during daylight hours.

CLOSURE-DERIVED MATERIAL DISPOSAL:

The contaminated materials which may be generated during closure will consist of rinseate. All rinseate generated will be properly disposed. Any contaminated soils excavated during closure will be disposed at a permitted hazardous waste disposal facility.

E. EMERGENCY INFORMATION

Emergency Contacts

DLA	Safety Officer	Donald G. Olmstead	412/931-8400
DLA	Project Manager	James P. Hannan	412/931-8400
DLA	Project Engineer	Scott A. Nesbit	412/931-8400
GE	Plant Contact	James Magella	216/297-0861

F. CONTINGENCY PLAN

The objective of the contingency plan is to minimize hazards to human health and the environment for fires, explosions, or any unplanned releases of hazardous waste into the air, soil, or surface water that may occur during the closure operation. In the event that a fire, spill, or other emergency situation develops, the project engineer will be responsible for coordinating all emergency response measures.

This person has the authority to commit all resources necessary to carry out the contingency plan. The project engineer will be Scott A. Nesbit of DLA.

1. Implementation of Contingency Plan

In case of an emergency situation, the safety officer has full authority to make the decision concerning the implementation of the contingency plan. Depending on the degree of seriousness, the following potential emergencies might call for the implementation of the contingency plan at the drum storage unit.

<u>Fire</u> - Due to the nature of the closure operation, the likelihood that a fire will occur is low. However, "clean" soils from an adjacent area maybe placed with a backhoe or front-end loader over the fire.

Explosion - Due to the nature of the closure operation, it is unlikely that an explosion will occur.

<u>Air Contamination</u> - Potential air releases are only likely to occur during soil disturbance activities such as excavation of contaminated soils.

2. Emergency Response Procedures

In the event of a non-acute emergency, the procedures listed below will be followed:

- a. Any employee discovering or causing a non-acute emergency situation must immediately contact the project engineer.
- b. The project engineer in conjunction with the G. E. personnel will assess the situation and contact the appropriate personnel to respond to the emergency situation.
- c. The project engineer in conjunction with the DLA team leader will take all necessary measures to contain the hazard and to prevent its spread to the environment.
- d. Safety measures will be taken to ensure maximum protection of emergency personnel and will include the use of appropriate protection equipment.
- e. All non-emergency personnel will be removed from the hazard area until the hazard has been contained and controlled. Personnel will assemble at the plant entrance gate until the project engineer determines that it is safe to resume work.

- f. Following containment and control of the emergency, the project engineer will assess the situation to determine if all contaminated wastes generated by the emergency personnel have been collected and disposed on site.
- g. The project engineer in conjunction with the G. E. personnel will ensure that all on-site emergency equipment is restored to full operational status by emergency personnel.
- h. The project engineer in conjunction with the G. E. personnel will investigate the cause of the emergency and will take steps to prevent the recurrence of such an incident.

SAN:mag/00241

GENERAL ELECTRIC COMPANY RAVENNA, OHIO

RAVENNA LAMP PLANT

CERTIFICATION OF CLOSURE DRUM STORAGE FACILITIES

EPA I.D. NO. OHD 059-061-317

KILLAM PROJECT NO. 2G038

OCTOBER 1992

Prepared By:

KILLAM ASSOCIATES, DLA DIVISION 100 Allegheny Drive Warrendale, Pennsylvania 15086 (412) 772-0200

GENERAL ELECTRIC COMPANY RAVENNA, OHIO

RAVENNA LAMP PLANT

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KILLAM ASSOCIATES, DLA DIVISION 100 Allegheny Drive Warrendale, Pennsylvania 15086 (412) 772-0200



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565

Telephone: 412-772-0200 Fax: 412-772-1955

copy: D.

D. Correia - GE

J. Magella - GE

M. Tukel - OEPA/NEDO
L. Pierard - US EPA (Certified)

CERTIFIED MAIL P 231 950 399 RETURN RECEIPT REQUESTED

October 16, 1992

Mr. Thomas Crepeau
Ohio Environmental Protection Agency
Division of Solid and Hazardous
Waste Management
PO BOX 1049
Columbus, Ohio 43266-0149

OCT 20 1992

OFFICE OF RCRA

OFFICE OF RCRA

Division

Waste Management Division
U.S. EPA, REGION V.

GENERAL ELECTRIC COMPANY RAVENNA LAMP PLANT OHD 059 061 317 KILLAM PROJECT NO. 2G038

Dear Mr. Crepeau:

Attached is the certification of closure (three copies) for the Ravenna plant RCRA storage unit located in Ravenna, Ohio. The certification has been signed by an independent, registered professional engineer and by the appropriate General Electric corporate officer. With the submission of the closure certification, all the OEPA requirements for the closure of this RCRA storage unit have been met.

Very truly yours,

Rick A. Myers, P.E.

Project Manager

Attachments RAM:PRZ/0679

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II.	CLOSURE ACTIVITIES		2
III.	ENGINEER'S CERTIFICATION		5

OWNER/OPERATOR CERTIFICATION

FIGURES

TABLES

EXHIBITS

I. <u>INTRODUCTION</u>

The General Electric Company has recently completed closure of one drum storage unit located at the Ravenna Lamp Plant, Ravenna, Ohio. The hazardous waste management unit was used for the storage of 55-gallon drums containing waste materials including acetone. trichloroethylene, denatured alcohol, petroleum oil, methanol, butyl acetate, waste stoddard solvent, and mixed radioactive/flammable Closure of this unit was conducted in accordance with the waste. General Electric closure plan which was approved by Ohio EPA on July 12, 1989, and a modified plan approved by Ohio EPA on December 11, 1991 with amended approval on February 21, 1992. Correspondence between OEPA and General Electric, Ravenna Lamp, is included in Exhibit A. The following information is submitted to certify closure of the unit in accordance with Ohio Administrative Code (OAC) 3745-66-15 and Title 40 Code of Federal Regulations (CFR) Part 265.115 pertaining to closure of hazardous waste management units.

II. CLOSURE ACTIVITIES

A. <u>Drum Storage Area</u>

Decontamination of the storage unit was performed on December 13, 1989 by 7-7 Inc. The contractor performed the decontamination of the unit in accordance with the approved closure plan. The unit consists of an approximate 12 foot by 12 foot area with a concrete floor and concrete block walls on two sides. Prior to decontamination, a minor floor crack was sealed with an epoxy sealant, and floor drain plugs were checked to assure tightness. Decontamination included the removal of all residual materials (i.e., dirt, dust), high-pressure washing of the unit surfaces, high-pressure rinsing of unit surfaces, collection and analysis of rinseate. All rinseate generated was collected and stored in 55-gallon drums. Rinsewater generated during decontamination was analyzed at DLA Lab and Ceimic Corporation in accordance with the approved closure plan. The storage unit location is shown on Figure 1. Results of analytical testing are attached in Table 1.

Following completion of the analytical testing, the results of the analyses were compared to the maximum concentrations allowable for volatile organics, and ignitability. Decontamination of the unit was performed until rinseate concentrations of the above parameters were below hazardous levels in OAC 3745-51, and the clean levels listed in the approved closure plan and amendment. Trichloroethylene and alcohol were found to be present in the rinseate from the December 13, 1989 cleaning. D & M Services performed the second set of decontamination activities as detailed above on May 2, 1990. Results of analysis are included in Table 1. Rinseate and wash water generated during decontamination was sampled, with analytical results shown as Wash drum sample in Table 1. The rinseate and wash water were collected for proper disposal.

Forty-three representative smear samples were collected on May 9, 1990 to determine the presence of radioactive thorium. Sample analysis results shown in Table 2 indicate the thorium level was below the clean level as accepted by the Nuclear Regulatory Commission (NRC). See Exhibit B for NRC correspondence. See Figure 2 for sampling grid locations.

B. Drain System

The decontamination activities on December 13, 1989 were to include rinsing of the six-inch drain pipe which collects the water from the storage unit area floor drains. Prior to pipe rinsing, excavation was performed to determine the type of pipe and its suitability for integrity testing. The six-inch terra-cotta pipe was damaged during excavation. Liquid which appeared to be backed up in the pipe, flowed out into surrounding soil. Upon further investigation in February 1990, a blockage was located approximately 25 feet from the building (between sample locations RS-1 and RS-2 on Figure 3). The terra-cotta pipe was removed from the area between the building wall and the concrete drive. Contaminated soil which was confined to the area around the damaged pipe, was removed and placed in rolloff boxes for proper disposal. A soil sample was also obtained from beneath the pipe at sample location RS-6 on Figure 3. No visible contamination was evident. Analytical results from the liquid (trench liquid) in the damaged pipe are shown in Table 1 and results from soils in the boxes and at RS-6 are presented in Table 3. The excavated areas are shown on Figure 3.

Additional excavation and sampling activities were performed on March 20 and 21, 1991. The terra-cotta pipe between sample locations RS-4 and RS-5 were removed and samples RS-1 through RS-5 were collected.

The remaining section of terra-cotta pipe beneath the outside concrete pad and drive was rinsed and a rinseate sample was obtained. The remaining section of cast iron drain pipe from the storage unit to the outside wall of the building was also rinsed and sampled. All soil samples and the terra-cotta pipe rinse samples indicate the soils and pipe are clean. The six-inch cast iron drain pipe rinseate showed elevated levels of trichloroethylene. See Tables 4 and 5 for water and soils analysis results, respectively. Based on the clean levels, the pipe beneath the outside concrete pad was abandoned in place and the excavations were backfilled. Collected wash and rinse waters were sampled with results presented in Table 6. The water in the drums were removed for treatment/disposal by Chemical Waste Management. See Exhibit C for documentation.

The six-inch cast iron pipe which extended from the floor drains to the outside wall was removed in July 1992. There was no visual evidence of leakage from the pipe or contaminated soils around or beneath the pipe. After removal, the pipe was placed in a rolloff box with previously excavated soils for proper disposal. Arrangements for disposal of contaminated soils and the pipe were in process at the time of this report.

III. ENGINEER'S CERTIFICATION

This information is submitted in accordance with OAC 3745-66-15 and 40 CFR 265.115 concerning certification of closure of hazardous waste management units.



Rick A. Myers, P.E. Name	
Rich A Myers	10-16-92
Signature	Date
	War a

Ohio

for the State of

Killam Associates, DLA Division
100 Allegheny Drive, Warrendale, PA 15086, 412/772-0200
Business Address and Telephone Number

Professional Engineer License Number

OWNER/OPERATOR CERTIFICATON

CERTIFICATION

I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete.

I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

GENERAL ELECTRIC COMPANY

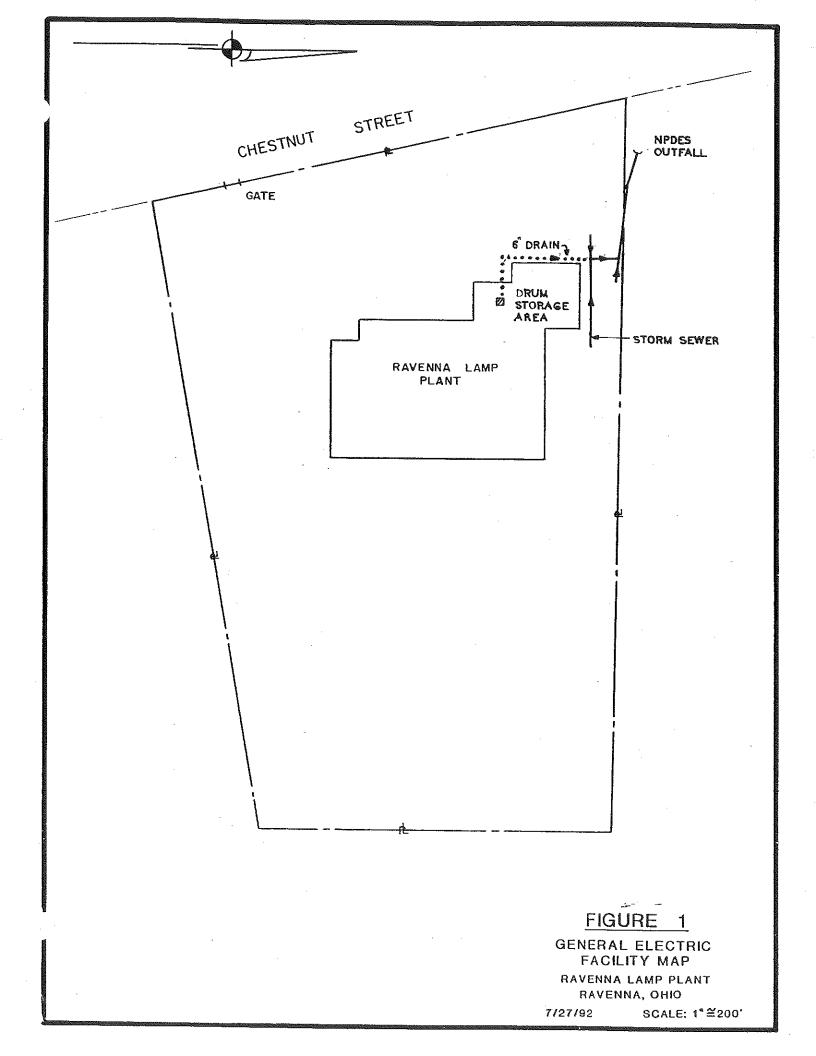
James Wiester, Plant Manager

8/29/92

Ravenna Lamp Plant

Date

FIGURES





DOOR

 $7 + \cdot$

DRUM 6 + STORAGE AREA

2 +

1 +

DOOR

NOTE:

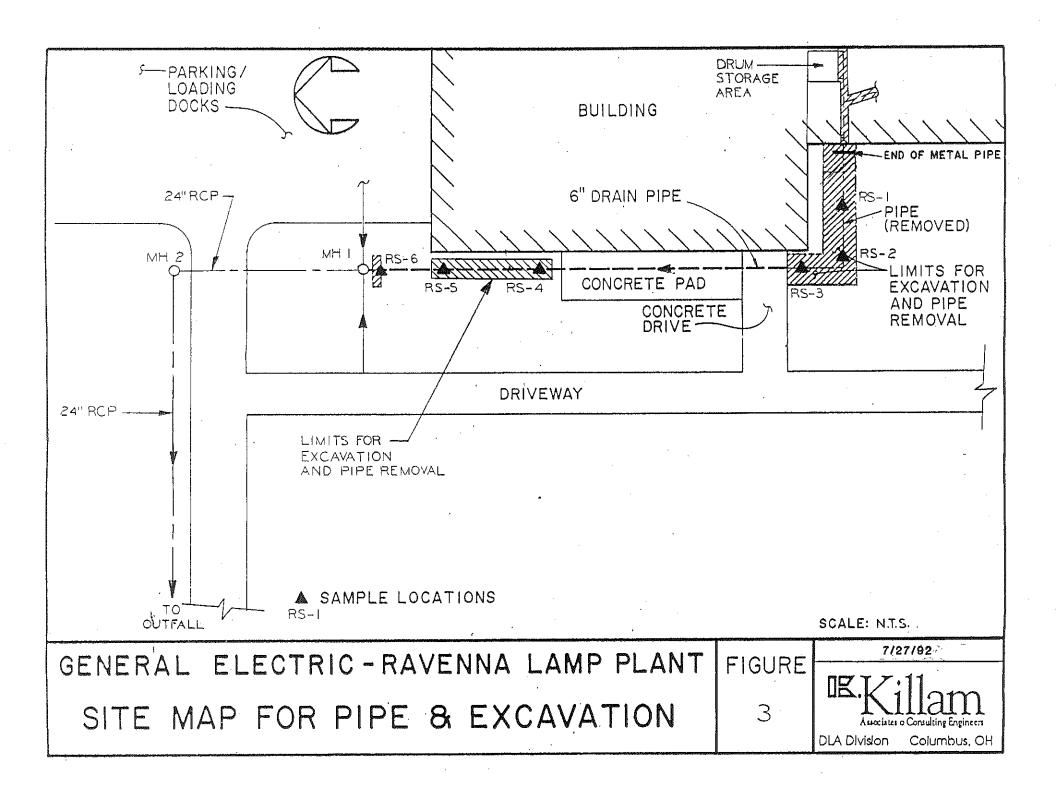
ALL GRID SQUARES ARE 3 FT, SQUARE. EXCEPT ROW 1 WHICH WAS 1X 3.

FIGURE 2

GENERAL ELECTRIC SAMPLING GRID RAVENNA LAMP MAP RAVENNA, OHIO

7/27/92

SCALE: N.T.S.



TABLES

TABLE 1 SAMPLE ANALYSIS STORAGE AREA CLEANING

DECEMBER 13, 1989

PARAMETER	UNIT	500000000000000000000000000000000000000	CLEAN LEVEL	BLANK	RINSE	WASH DRUM	TRENCH LIQUID
IGNITABILITY	deg F	-	> 140	> 200	> 200	> 200	7 7
ACETONE	mg/l	1.0	1.0	< 1.0	< 1.0	< 1.0	< 100
ALCOHOL	mg/I	1.0	1.0	< 1.0	5	1.4	< 100
METHANOL	mg/l	1.0	1.0	< 1.0	< 1.0	1.0	< 100
TRICHLOROETHYLENE	mg/l	0.0001	0.005	0.0003	0.0037	0.0135	5150

MAY 2, 1990

PARAMETER	UNIT		CLEAN LEVEL	BLANK	RINSE	HOSE
IGNITABILITY ,	deg F	-	> 140			
ACETONE	mg/I	1.0	1.0			
ALCOHOL *	mg/I	* 0.5	1.0	ND	ND	ND
METHANOL	mg/I	1,0	1.0	<u> </u>		
TRICHLOROETHYLENE	mg/1	0.0001	0.005	0.0019	0.0033	0.0024

NOTES:

ND - NOT DETECTED

- THE METHOD REPORTING LIMIT (MRL) FOR ALCOHOL (ETHANOL) IS 5.0 MG/L. DETECTION (ND) IS LESS THAN ONE-TENTH OF THE MRL OR 0.5 MG/L.

deg.F - DEGREES FAHRENHEIT

mg/I – MILLIGRAMS PER LITER, OF PARTS PER MILLION

BLANK - DISTILLED WATER BLANK

RINSE - SECOND RINSE OF FLOOR

DRUM - RINSE AND WASH WATER COLLECTED IN A DRUM

HOSE - TAP WATER FROM SUPPLY HOSE

TABLE 2
RADIATION ANALYSIS
SAMPLE DATE: MAY 9, 1990

SAMPLE	ANALVOI	S RESULTS
LOCATION		
LOCATION	TOTAL uCi	dpm/100cm2
A-1	< 1.2E-06	< 3
A-2	< 1.2E-06	< 3
A-3	< 1.0E-06	< 2
A-4	< 1.0E-06	< 2
A-5	< 1.0E-06	< 2
A6	< 1.0E-06	< 2
A-7	< 1.2E-06	< 3
B-1	< 1.2E-06	< 3
B-2	< 1.2E-06	< 3
B-3	< 1.2E-06	< 3
B-4	< 1.2E-06	< 3
B-5	< 1.2E-06	< 3
B-6	< 1.2E-06	< 3
B-7	< 1.2E-06	< 3
C-1	1.3E-06	3
C-2	< 1.2E-06	< 3
C-3	< 1.2E-06	< 3
C-4	1.5E-06	3
C-5	1.4E-06	3
C-6	< 1.2E-06	< 3
C-7	1.8E-06	4

SAMPLE	ANALYSIS	RESULTS
LOCATION	TOTAL uCi	dpm/100cm2
D-1	< 1.2E-06	< 3
D-2	< 1.2E-06	< 3
D-3	< 1.2E-06	< 3
D-4	1.7E-06	4
D-5	< 1.2E-06	< 3
D-6	< 1.2E-06	< 3
D-7	4.9E-06	11
E-1	1.2E-06	.3
E-2	< 1.2E-06	< 3
E-3	< 1.2E-06	< 3
E-4	< 1.2E-06	< 3
E-5	< 1.2E-06	< 3
E-6	4.9E-06	11
E-7	2.7E-05	61
E-8	< 9.6E-07	< 2
F-1	< 9.6E-07	< 2
F-2	< 9.6E-07	< 2
F-3	< 9.6E-07	< 2
F-4	1.3E-06	3
F-5	< 7.9E-07	< 2
F-6	4.5E-06	10
F-7	2.0E-05	44

NOTES:

ALL ANALYSIS WAS PERFORMED ON WIPE SAMPLES FOR THORIUM CLEAN LEVEL IS 200 dpm/100cm2
SEE FIGURE 2 FOR SAMPLE LOCATION GRID
uCi – MICROCURIES, 1.2E-06 EQUALS 0.0000012

dpm/100cm2 - DISINTEGRATIONS PER MINUTE PER 100 SQUARE CENTIMETERS

TABLE 3 SOIL SAMPLE ANALYSIS OUTSIDE EXCAVATION

DECEMBER 13, 1989

PARAMETER	UNIT	DET. CI LIMIT LI	LEAN EVEL	1A	1B	1C
IGNITABILITY	deg F	-	> 140	neg.	neg.	neg.
ACETONE	mg/kg	1	ADL	< 1.0	< 1.0	< 1.0
ALCOHOL	mg/kg	1	· ·	< 1.0	< 1.0	< 1.0
METHANOL	mg/kg	1	ADL	15	7.1	3.5
TRICHLOROETHYLENE	mg/kg	0.1	ADL	0.7	0.1	0.1

FEBRUARY 6 & 7, 1990

•		DET.	CLEAN	BOX 2083		BOX	2079	BOX 12		
PARAMETER	UNIT	LIMIT	LEVEL	S1	S2	\$3	S 4	S 5	S 6	
TRICHLOROETHYLENE	ug/kg	5	ADL	17	10	ND	ND	ND	ND	
ACETONE *	ug/kg	50	ADL	74	64	98	ND	96	110	
METHYLENE CHLORIDE	ug/kg	5	ADL	ND	ND	ND	ND	ND	ND	
METHANOL	mg/kg	0.5	ADL	ND	ND	ND	ND	· ND	ND	
n-BUTYL ACETATE	mg/kg	1	ADL	ND	ND	ND	ND	ND	ND	

		DET.	CLEAN	STO	CKPILE	MANHOLE #1 (RS-6)		
PARAMETER	UNIT	LIMIT	LEVEL	S 7	S 8	1A	1B	
TRICHLOROETHYLENE	ug/kg	5	ADL	ND	ND	ND	ND	
ACETONE	ug/kg	50	ADL	84	110	54	66	
METHYLENE CHLORIDE	ug/kg	5	ADL	ND	ND	ND	ND	
METHANOL	mg/kg	0.5	ADL	ND	ND	ND	ND	
n-BUTYL ACETATE	mg/kg	1	ADL	ND	ND	ND	ND	

NOTES:

LAB BLANKS FOR ACETONE HAD 80 ug/kg AND 100 ug/kg.

ND - NOT DETECTED

ADL - ANALYTICAL DETECTION LIMITS

ug/kg - MICROGRAMS PER KILOGRAM OR PARTS PER BILLION

mg/kg - MILLIGRAMS PER KILOGRAM OR PARTS PER MILLION

neg. - INDICATES NOT IGNITABLE PER 40CFR260.21 AND OAC 3745-51-21.

A - ZERO TO SIX INCH DEPTH; B - SIX TO TWELVE, C - TWELVE TO EIGHTEEN

TABLE 4

SAMPLE ANALYSIS

DRAIN RINSEWATER

SAMPLE DATES: MARCH 20 & 21, 1991

PARAMETER	UNIT	DET. LIMIT	CLEAN LEVEL	RINSE 1 RW-2	RINSE 2 RW-3	TAP RW-5	BLANK RW-11	DISTILLED RW-4
IGNITABILITY	deg F	1	> 140	* > 200	> 200	> 200		neg.
ACETONE	mg/l	1,0	1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
ALCOHOL	mg/I	1	1.0	ND	ND	ND		
METHANOL **	mg/l	** 0,5	1.0	ND	ND	ND		
TRICHLOROETHYLENE	mg/l	0.005	0.005	5.6	< 0.005	< 0.005	< 0.005	< 0.005
METHYLENE CHLORIDE	mg/l	1		< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

NOTES:

RINSE 1

- SIX-INCH CAST IRON DRAIN FROM INSIDE STORAGE PAD TO OUTSIDE

RINSE 2

- DRAIN PIPE FROM SOUTH END OF OUTSIDE STORAGE PAD TO NORTH END

ND

- NOT DETECTED

TAP

- TAP WATER FROM SUPPLY HOSE

BLANK

- TRIP BLANK, DISTILLED WATER

DISTILLED - FIELD BLANK, DISTILLED WATER

neg.

~ INDICATES NOT IGNITABLE PER 40CFR260.21 AND OAC 3745-51-21. FOR LIQUIDS, THAT

IS GREATER THAN 140 DEGREES FAHRENHEIT.

- INITIAL ANALYSIS RESULT WAS 105; REPEAT OF ANALYSIS HAD RESULTS OF > 200.

- THE METHOD REPORTING LIMIT (MRL) FOR METHANOL IS 5.0 MG/L. DETECTION (ND) IS LESS THAN ONE-TENTH OF THE MRL OR 0.5 MG/L.

deg F

- DEGREES FAHRENHEIT

mg/1

- MILLIGRAMS PER LITER OR PARTS PER MILLION

TABLE 5 SOIL SAMPLE ANALYSIS OUTSIDE DRAIN SAMPLE DATE: MARCH 20, 1991

	DET.	DET. CLEAN		RS-1			RS-2			RS-3		
PARAMETER	UNIT LIMIT	LEVEL	Α	В	С	Α	В	C	A	В	С	
IGNITABILITY	deg.F	> 140	neg.									
ACETONE	mg/kg [ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
ALCOHOL	mg/kg 2	— —	ND									
METHANOL	mg/kg 12	ADL	ND									
METHYLENE CHLORIDE	mg/kg I	ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
TRICHLOROETHYLENE	mg/kg 1	ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
N-BUTYL ACETATE	mg/kg 0.012	ADL	ND									

	DET.		RS-4		RS-5			
PARAMETER	UNIT LIMIT	LEVEL	A	В	С	Α	В	C
IGNITABILITY	deg.F —	> 140	neg.	neg.	neg.	neg.	neg.	neg.
ACETONE	mg/kg 1	ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
ALCOHOL	mg/kg 2		NĐ	ND	ND	ND	ND	ND
METHANOL	mg/kg 12	ADL	ND	ND	ND	ND	ND	ND
METHYLENE CHLORIDE	mg/kg I	ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
TRICHLOROETHYLENE	mg/kg 1	ADL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
N-BUTYL ACETATE	mg/kg 0.012	ADL	ND	ND	ND	ND	ND	ND

NOTES:

ADL - ANALYTICAL DETECTION LIMITS

ND - NOT DETECTED

A - ZERO INCHES TO SIX INCHES BELOW PIPE; B - 6" TO 12"; C - 12" TO 18"

neg - NOT IGNITABLE PER 40 CFR 261.21 AND OAC 3745-51-21

deg F - DEGREES FAHRENHEIT

mg/kg - MILLIGRAMS PER KILOGRAM OR PARTS PER MILLION

SEE TABLE 3 FOR SAMPLE RS-6 RESULTS SEE FIGURE 3 FOR SAMPLE LOCATIONS

TABLE 6

SAMPLE ANALYSIS

DRAIN RINSEATE

SAMPLE DATES: MARCH 20 & 21, 1991

PARAMETER	UNIT	DET. LIMIT	DRUM C RW-8	DRUM G RW-13	DRUM E RW-10	DRUM A RW-6	DRUM B RW-7	EQ. RINSE RW-1
IGNITABILITY	deg F	-	> 200	> 200	150	neg.	neg.	
ACETONE	mg/l	1.0	< 1.0	< 1.0	< 1.0	<·1.0	< 1.0	< 1.0
ALCOHOL	mg/l	1.0	ND	ND	ND			
METHANOL	mg/l	5	ND	ND	ND			
TRICHLOROETHYLENE	mg/l	0.005	0.022	2.8	28	49	13	< 0.005
METHYLENE CHLORIDE	mg/l	1	< 1.0	< 1.0	< 1.0	< 1.0	13	< 1.0
N-BUTYL ACETATE	mg/l	0.01	0.078	7.4	74			

NOTES:

ND

- NOT DETECTED

neg.

- INDICATES NOT IGNITABLE PER 40CFR260.21 AND OAC 3745-51-21. FOR LIQUIDS, THAT

IS GREATER THAN 140 DEGREES FAHRENHEIT.

deg F

- DEGREES FAHRENHEIT

mg/I

- MILLIGRAMS PER LITER OR PARTS PER MILLION

DRUM

- RINSE AND WASH WATER COLLECTED IN A DRUM

EQ RINSE - RINSE OF SOIL SAMPLING EQUIPMENT BETWEEN SAMPLES

EXHIBITS

EXHIBIT A

CORRESPONDENCE OHIO EPA AND GENERAL ELECTRIC



*ste of Ohio Environmental Protection Agency

പ.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

July 12, 1989

Re: Closure Plan General Electric (GE) Ravenna Lamp OHD 059 061 317/02-67-0158

Mr. James Magella General Electric (GE) Ravenna Lamp 6800 N. Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

On September 13, 1988, GE Ravenna Lamp submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at 6800 N. Chestnut Street, Ravenna, Ohio. Revisions to the closure plan were received on May 5, 1989. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that GE Ravenna Lamp's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of GE Ravenna Lamp in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that, with modifications, the closure plan for the hazardous waste facility at GE Ravenna Lamp meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by GE Ravenna Lamp is hereby approved with the following modifications:

1. GE-Ravenna Lamp shall have the independent, professional engineer (PE) observe not only sampling activities (both rinseate and soils) but also have him/her inspect the pad for cracking, supervise sealing of the drainage piping, supervise any removal of contaminated soils, and supervise/ensure that the health and safety plan is appropriately implemented.

Obio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUL 12 1989

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

.

By Carolin recoderus Date 7/12/89

- Prior to rinsing the six-inch drain, GE shall be sure that there is no leakage occurring that may allow hazardous wastes or hazardous waste constituents to escape into surrounding soils.
- 3. GE has not indicated that they have made any contact with the Nuclear Regulatory Comission (NRC) regarding the radioactive thorium wastes stored at the facility. Within 30 days of the date of this letter, GE shall submit all correspondence with the NRC to Ohio EPA (as per comment #2 in the Director's February 21, 1989 final disapproval letter) to Andrea Dakoski, Ohio EPA, NEDO, and Paul Vandermeer, Ohio EPA, Central Office, DSHWM. GE shall also provide Ohio EPA with documentation for the rinseate "clean" levels chosen for radioactive substances as listed in the revised closure plan.
- 4. Within 30 days of the date of this letter GE shall provide justification for the background limit given for thorium.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq. of the Revised Code or Chapters 3734 or fill of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing herein shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seg., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response actions relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

Ohio Environmental Protection Agency Entened Director's Journal

JUL 12 1989

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Caroly Nicodemus Date 7/12/89

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street. Room 300, Columbus. Ohio 43266-0557

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

Richard L. Shank, Ph.D.

Director

RLS/PV/pas

cc: Paul Vandermeer, Ohio EPA, OSHWM
Lisa Pierard, US EPA-Region V
Joel Morbito, USEPA - Region V
Tom Crepeau, Ohio EPA, DSHWM Central File
Andrea Dakoski, NEDO, Ohio EPA

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Obio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

JUL 1 2 1989

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Caroly Microlinus Date 7/12/89



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565

Telephone: 412-772-0200 Fax: 412-772-1955

December 4, 1989

Ms. Andrea Dakoski Ohio Environmental Protection Agency Northeast District Office Division of Solid and Hazardous Waste Management 2110 E. Aurora Road Twinsburg, OH 44087

RE: CLOSURE PLAN MODIFICATIONS
GENERAL ELECTRIC COMPANY - RAVENNA LAMP PLANT
OHD 059 061 317
KILLAM JOB NO. 2G018.07

Dear Ms Dakoski:

The following information is submitted as required by the OEPA closure plan approval letter of July 12, 1989 for the RCRA storage unit at the General Electric, Ravenna Lamp Plant.

- 1. A Ohio licensed professional engineer will be present during all critical closure activities.
- 2. The Nuclear Regulatory Commission was contacted to determine the appropriate closure requirements for the removal of radioactive thorium wastes stored at the facility. A copy of this correspondence was forwarded to the OEPA in March of this year.
- 3. The background limit for radioactive thorium was established through conversations with Ms. Evelyn Matson of the United States Nuclear Regulatory Commission, which were summarized in the letter of March 9, 1989.
- 4. Closure of the storage unit will commence after the pressure testing of the drainage piping. The structural integrity of this drain pipe will be tested by sealing the ends of the pipe and subjecting the pipe to air pressure of 2 psi. Once it has been determined that this piping is leak proof, the piping will be decontaminated as described in the closure plan.



Ms. Andrea Dakoski December 4, 1989 Page Two

If the piping is determined to be structurally deficient and leaking, the location of the leak will be determined where possible, and soil samples will be collected in that area. No sampling will be conducted in areas where the piping is inaccessible (ie. beneath the building). Soil sampling will then commence as outlined in the approved closure plan.

Closure of the storage unit is presently scheduled for the week of December 11, 1989. At this time we are requesting a ninety day extension on the time allowed to complete the closure operations. If you have any questions regarding this information please contact me or James Magella of General Electric, Ravenna Lamp.

Very truly yours,

Scott A. Nesbit Staff Engineer

Enclosure

cc/encl: Mr. James Magella, GE, Ravenna Lamp

Mr. Paul Vanermeer, Ohio EPA, Central Office



DLA Division

Thom Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955

12-20-89

Ohio Environmental Protection Agency Northeast District Office Division of Solid and Hazardous Waste Management 2110 E. Aurora Road Twinsburg, OH 44087 Attn: Andrea Dakoski

RE: CLOSURE PLAN MODIFICATIONS

GENERAL ELECTRIC COMPANY- RAVENNA LAMP PLANT

OHD 059 061 317

KILLAM JOB No. 2G018.07 ·

Gentlemen:

On Wednesday, December 13, 1989, closure of the hazardous waste storage pad at the General Electric Company's Ravenna Lamp Plant began. At that time the 12' X 12' storage pad was pressure washed and rinsed, and a representative sample of the final rinse was collected to determine the adequacy of closure. The results of the rinseate testing are expected in two weeks.

Also involved in the closure, is the cleaning and rinsing of a six inch drain line connected to the storage pad. Closure of this drain line included the pressure testing of the line to determine its structural integrity prior to cleaning and rinsing. Before pressure testing of the line was to begin however, a backhoe was used to excavate near the drain in order to expose it and identify the type of material the drain line was constructed of. The drain line was discovered to consist of six foot terra-cotta sections imbedded in a blackish colored sand. The drain line appeared to be clogged.

During the excavation, the pipe was broken and several gallons of what appeared to be butyl acetate was found to have collected in the trench excavation. A sample of this material was collected and is being analyzed for the parameters outlined in the approved closure plan.

Since it has now been determined that the drain line is constructed of terra-cotta sections, and would therefore not pass a pressure test as outlined by the OEPA closure plan approval letter, several modifications to the existing closure plan are proposed. These modifications are outlined below;

1.) No pressure testing of the terra-cotta pipe will be performed. Terra-cotta pipe will not withstand the constant pressure proposed in the closure plan.

GENERAL 🚱 ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

SUBJECT

WASTE ANALYSIS
PLAN

FILE

NO.

SENT TO: ALL MANUAL HOLDERS

I. PURPOSE

In accordance with 40 CFR Part 265, Subpart B, this plan is designed to achieve the following objectives:

- A. Identify the steps necessary to obtain the information which must be known to treat, store, or dispose of waste in accordance with the requirements of this Part.
- B. Provide a timetable to ensure that analysis of the waste is accurate and up-to-date.

II. PLAN

A. <u>Test Parameters</u>

A solid waste is hazardous if it exhibits any of the following characteristics:

- 1. Ignitability
- Corrosivity
- Reactivity
- 4. EP Toxicity

Tests shall be conducted on each of the above parameters unless on the basis of knowledge of the process of the waste stream, the characteristic is definitely not present in the waste. Documentation of the rationale used in eliminating any of the above parameters shall be entered into the operating record of the facility.

Tests of EP Toxicity should include analysis for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver along with:

- Endrin, Lindane, etc. (from Table I, Part 261.24) if suspected to be present,
- Any hazardous constituent for which the waste was listed as a hazardous waste from non-specific/specific sources, if so listed,
- c. any other toxic metal known to be present in the waste.

GENERAL 🏈 ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

SUBJECT

WASTE ANALYSIS PLAN

FILE

NO.

SENT TO: ALL MANUAL HOLDERS

B. <u>Test Methods</u>

The testing procedures used to determine the above characteristics shall be as follows:

- 1. Ignitability by definitions in Part 261.21 and the ASTM standards D-93-79 or D3278-78 for flash point.
- Corrosivity pH

 2 or
 ≥ 12.5 or corrosivity toward steel. ("Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods") SW-846, USEPA.
- 3. Reactivity by definition in Part 261.23.
- 4. EP Toxicity methods to be used are referenced in Appendix V, Table 2 and can be found in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods") SW-846, methods 8.50-.60.

For specific information on the above test methods, contact the Industrial Hygiene Chemist, Environmental Control Operation of the Lighting Research and Technical Services Operation, Nela Park.

C. Sampling Methods

- The methods and equipment used to sample waste materials will vary with the form and consistency of the waste to be sampled. Samples collected using the equipment and procedures listed below for waste with similar properties will give representative samples.
 - a. viscous liquids ASTM standard D-140-70
 - b. crushed or powdered material ASTM standard D-346-75
 - soil or rock-like material ASTM standard D-420-69
 - d. soil-like material ASTM standard D-1452-65
 - e. fly ash ASTM standrad D 2234-76
 - f. containerized liquids in ponds, pits, lagoons, etc. Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods
 - g. for wastes not covered by the above descriptions, contact the Industrial Hygiene Chemist, ECO for proper methods and equipment.

GENERAL 🚳 ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

TAB WASTE ANALYSIS NO. PLAN

SENT TO: ALL MANUAL HOLDERS

h. The number of samples needed to evaluate a waste is dependent upon the degree of uniformity and homogenity exhibited by the waste. Continuous operations would requires minimum testing while non-uniform batch operations would require more extensive testing. The recommended minimum is three (3) samples.

FILE

- i. Samples should be collected in polyethlene bottles (glass bottles when organics are to be done) and shipped by surface transportation to Industrial Hygiene Laboratory, ECO or to an ECO approved commercial lab., be sure to contact them for specific shipping instructions.
- j. Samples must be accompanied by a Sample Analysis Request Form (Figure 1.1) containing information on the type of process producing the waste, suspected composition, description of sampling point and method, and the analyses requested. A copy of this form then becomes part of the facility operating record.

D. Frequency

The initial analysis of the waste shall be reviewed or repeated to ensure that the analysis is up to date and accurate whenever any of the following occur:

- a. A change in the process producing the waste.
- b. A change in the method used to treat the waste.
- c. A change in major raw material component or minor component if that component contains a listed toxic chemical.
- d. There is any additional reason to believe the characteristics of the waste have changed.

E. Off-Site Facilities

Waste from off-site facilities (even other G.E. facilities) shall not be accepted without prior consultation with ECO. Waste shall be accepted only when:

- a. the generator supplies a detailed physical/chemical analysis of the waste, or
- the waste is similar to waste generated on-site and the on-site waste has been well characterized, or

ISSUED BY	DATE ISSUED	SUPERSEDES ISSUE DATED	PAGE
			OF

Form 3949-485

GENERAL 🏈 ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

SUBJECT

LAND DISPOSAL RESTRICTIONS

WASTE ANALYSIS PLAN

FILE

NO.

SENT TO:

The following amendment is to establish guidelines for the handling of shipments of hazardous waste to be sent to approved disposal landfills. Identification, testing, notification and recordkeeping will be in accordance with the regulations published in 40 CFR Part 268 and will cover both "Land Disposal Restrictions" and the "California list" of restricted materials.

IDENTIFICATION/TESTING

The following solvent waste (F001-F005) are prohibited from land disposal along with liquid waste that contain concentrations of the listed materials. (See Tables 1 and 2).

For solvent waste restricted under this rule treatment is required until the level of hazardous constituent in an extract of the waste is lower than the level specified in table CCWE ("Constituent Concentration in Waste Extract") of 40 CFR 268.41. All testing will be done per the Toxicity Characteristic Leaching Procedure (TCLP).

NOTIFICATION

Under the requirements of 40 CFR Part 268, restricted wastes which include the spent solvent wastes listed must be treated to meet specificed standards before they can be landfilled of otherwise disposed of properly. Since we do not treat or dispose of waste on site a notification to the disposer that our restricted waste must be treated is to be completed and forwarded with each manifested shipment. (See Form 1).

RECORDKEEPING

All notifications and manifest associated with the shipment of a restricted waste will be kept for a minimum of (5) years and be made available to the controlling government agency upon request.

DATE ISSUED SUPERSEDES ISSUE DATED

OF

GENERAL 🚱 ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

SUBJECT

LAND DISPOSAL RESTRICTIONS

AB

FILE

WASTE ANALYSIS PLAN

SENT TO:

Constituent Concentration in Waste Extract (CCWE) Table

	Treatment Standard (mg/l)			
Solvent Constituent	Wastewaters	All Other Wastes		
Acetone	0.05	0.59		
n-Butyl alcohol	5.0	5.0		
Carbon disulfide	1.05	4.81		
Carbon tetrachloride	0.05	0.96		
Chlorobenzene	0.15	0.05		
Cresois	2.82	0.75		
Cresylic acid	2.82	0.75		
Cyclohexanone	0.125	0.75		
1,2-Dichlorobenzene	0.65	0.125		
Ethyl acetate	0.05	0.75		
Ethyl benzene	0.05	0.053		
Ethyl ether	0.05	0.75		
Isobutanol	5.0	5.0		
Methanol	0.25	0.75		
Methylene chloride	0.20	0.96		
Methylene chloride (from				
pharmaceutical industry)	.44	0.96		
Methyl ethyl ketone	0.05	0.75		
Methyl isobutyl ketone	0.05	0.33		
Nitrobenzene	0.66	0.125		
Pyrdine	1.12	0.33		
Tetrachloroethylene	0.079	0.05		
Toluene	1.12	0.33		
1,1,1-Trichloroethane	1.05	0.41		
1,1,2-Trichloro-				
1,2,2-Trifluoroethane	1.05	0.98		
Trichloroethylene	0.062	0.091		
Trichlorofluoromethane	0.05	0.96		
Xylene	0.05	0.15		

Table I

- (1) Free cyanides at concentrations greater or equal to 1000 mg/l.
- (2) One (or more) of these metals (or elements) at concentrations greater than or equal to those specified below:
 - a. Arsenic and/or compounds (as As) 500 mg/l:
 - b. Cadmium and/or compounds (as Cd) 100 mg/l;
 - c. Chromium VI and/or compounds (as CrVI) 500 mg/l;
 - d. Lead and/or compounds (as PB) 500 mg/l;
 - e. Mercury and/or compounds (as Hg) 20 mg/l;
 - f. Nickel and/or compounds (as Ni) 134 mg/l;
 - g. Selenium and/or compounds (as Se) 100 mg/l;
 - h. Thallium and/or compounds (as TH) 130 mg/l.
- (3) Liquid hazardous wastes having a pH less than or equal to two (2.0).
- (4) Liquid and non-liquid hazardous wastes that contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1,000 mg/l.
- (5) Polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm. (Remember the waste must also be a RCRA hazardous waste).

Table II

ISSUED BY	DATE ISSUED	SUPERSEDES ISSUE DATED	PAGE			
			OF			
	ISSUED BY	ISSUED BY DATE ISSUED				



State of Ohio Environmental Protection Agency

Northeast District Office 2110 E. Aurora Road Twinsburg, Ohio 44087 (216) 425-9171 and Bu

Richard F. Celeste Governor

January 31, 1989

RE: GENERAL ELECTRIC COMPANY
RAVENNA LAMP PLANT
OHD 059-061-317

0158

James Magella General Electric Company Ravenna Lamp Plant

Ravenna, Ohio 44667

6800 North Chestnut Street

Dear Mr. Magella:

On January 23, 1989, Kris Coder and I conducted a RCRA hazardous waste inspection of General Electric Company in Ravenna. The purpose of the inspection was to determine the facility's compliance with all applicable federal and state hazardous waste regulations. You represented the facility during the inspection.

The General Electric Ravenna Lamp Plant manufactures high intensity lamps, including mercury, multivapor, and high pressure sodium lamps. The facility generates waste solvent used in cleaning and degreasing operations. Trichloroethylene is reclaimed by Gold Shield in Euclid. Acetone, denatured alcohol, butyl acetate, naptha, and methylene chloride are reclaimed by Hukill in Bedford. Acids used for cleaning parts include nitric, hydrochloric, sulfuric, and hydrofluoric acid. Waste acid is treated in an elementary neutralization unit that discharges to the Ravenna Wastewater Treatment Plant. Mercury is reclaimed by B.F. Goldsmith in Evanston, Illinois.

The following violations were noted during the inspection:

- 1. Acetone is coded as D001 on manifests to Hukill. The acetone waste should be coded F003 [OAC 3745-52-21(A) and 40 CFR 262.21(a)].
- 2. Annual training has not been conducted since late 1986, early 1987 [OAC 3745-52-34(A)(4) and 40 CFR 262.34(a)(4), OAC 3745-65-16(C) and 40 CFR 265.16(c)].
- 3. Inspections of the drum storage area have not been documented since October, 1987 [OAC 3745-65-15 and 40 CFR 265.15, OAC 3745-66-74 and 40 CFR 265.174].
- 4. Closure plan violations: The facility has submitted a closure plan in response to a call in of their Part B permit. The plan has been disapproved and deficiencies were noted in the dispproval letter dated January 17, 1989 [OAC 3745-65-112(B)(3,4,5 and 6)]. Two additional items should be added to this list. The facility has determined that the drum storage area drains to a storm sewer that discharges to a creek. This system must be included in the closure plan. Also, methylene chloride is stored in the drum storage area and must be included in the closure plan.

1/23/89 9:30 HM - 1:45 PM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

		HWFAB # 02-67-0158
GENERAL INFORMATION		U.S. EPA I.D. # OHD 059 06/3/7
Facility: <u>GENERAL ELE</u> CTR	IC RAVENING LAMPPLANT 6800 N. CHRSTNUT ST.	city: <u>PAVENNA</u>
State: <u>OH</u>		Telephone: <u>216 297 0861</u>
	INSPECTION PARTICIPANT(S)	
(Name)	(Title)	(Telephone)
1. JAMES MAGELL	A PROJECT ENGINEER - SAFETY,	216 297 0861
2	ENVIRONMENTAL, AND FACILITIES	
3		
	INSPECTOR(S)	
1. ANDREA DAKOSK	1 ENVIRONMENTAL SCIENTIST	216 425 9171
2. KRIS CODER	ENVIRON MENTAL SCIENTIST	216 425 9171
3.		
	INSTALLATION ACTIVITY	
Mark One	If the site is a TSDF, check the boxes indicating	which areas were reviewed.
Generator only (G)	General Facility Standards, Preparedness	/_/ Waste Piles SO3
/_/ Transporter (T)	and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure	Land Treatment D81
/_/ TSDF only	Containers SO1	/ Landfills D80
/ G-T	// Tanks S02/T01	/_/ Chemical/Physical/ Biological TO4
/_/ G-TSDF		/ / Groundwater Monitoring
<u>/_</u> / T-TSDF	/_/ Inclneration/Thermal Treatment	/ / Post-Closure
/ / G-T-TSDF	· ·	1 L021-C10301 C

RCRA INTERIM STATUS INSPECTION FORM

		162	.110	17777	Kemark #
1.	Has the facility submitted a Part A to Ohio?	×			
2.	If "yes", is it complete and accurate?	丫			
3.	Has the facility submitted a Part B?		X		
4.	Was advance notice of the inspection given? If so, how far in advance?	ア			2 WEEKS
	IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.				

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

The General Electric Rayenna Lamp Plant manufactures high intensity lamps, including mercury, multivapor, and high pressure sodium lamps. The facility generates waste solvent used in cleaning and degreasing operations. Trichloroethylene is reclaimed by Gold Shield in Euclid. Acetone, denatured alcohol, butyl acetate, naptha, and methylene chloride are reclaimed by Hukill in Bedford. Acids used for cleaning parts include nitric, hydrochloric, sulfuric, and hydrofluoric acid. Waste acid is treated in an elementary neutralization unit that discharges to the Rayenna Wastewater Treatment Plant. Mercury is reclaimed by B.F. Goldsmith in Evanston, Illinois.

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

			<u>Yes</u>	<u>No</u>	N/A	Remark #
١.	ack	hazardous waste(s) generated at this facility have been tested or are nowledged to be hazardous waste(s) as defined in Section 261 and in pliance with the requirements of Sections 262.11. [3745-52-11(D)]	×			
2.	reg	s this facility generate any hazardous wastes that are excluded from ulation under Section 261.4 [3745-51-04] (statutory exclusions) or tion 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	7		•	MERCURY #1
3.	fro: [37	s this facility have waste or waste treatment equipment that is excluded m regulation because of totally enclosed treatment (Section 265.1(c)(9)) 45-65-01] or via operation of an elementary neutralization unit and/or tewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<u>X</u>			ACID NOTEAUZAT
4.	The use	generator meets the following requirements with respect to the preparation, and retention of the hazardous waste manifest:				
	a)	The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].		X		ACETONE WASTE CODED AS DOO!
	b)	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	×			Management
	c)	Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	X		-	
	d)	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].			X	
	e)	Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	X	* ***		

	•	<u>Yes</u>	<u>No</u>	N/A	Remark #
5 ⁻ .	The generator means the following hazardous waste pre-transport requirements:				
	a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	×		~	***************************************
	b) Prior to offering hazardous wastes for transport off-site each container wit a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	h ×			Barriella agranda
	c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<u>×</u>			
6.	Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]		X		<u> </u>
7.	If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
	a) The containers are clearly marked with the words "Hazardous Waste".	S 		\times	
	b) The date that accumulation began is clearly marked on each container.			X	
8.	The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]		×		NO ANNUAL TRAINING
9.	The generator keeps all of the records required by Section 265.16(d)(e)				
	[3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	X		***************************************	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- # MERCURY IS RECLAIMED BY B.F. GOLDEMITH, EVANSTON, ILLINOIS. IN THIS APPLICATION IT IS A COMMERCIAL CHEMICAL PRODUCT AND IS EXCLUDED FROM REGULATION.
- #2 ACIDS ARE TREATED IN AN ELEMENTARY NEUTRALIZATION UNIT THAT DISCHARGES TO THE RAVENNA WATP.
- #3 ACETONE IS CODED AS DOOL ON MANIFESTS TO HUKILL. SHOULD BE FOOS.
- #4 ANNUAL TRAINING HAS NOT BEEN CONDUCTED SINCE LATE 1986, EARLY 1987.

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS Yes No N/A Remark # <u>Subpart B: General Facility Standards</u> 1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)] 2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)] 3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)] IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE". 4. The facility has a) A 24-hour surveillance system, or b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

			Yes	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6.	a)	The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		<u>×</u>		#5
	b)	Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]		<u>X</u>		#6
7.	Sec eme	facility has provided a Personnel Training Program in compliance with tion 265.16(a)(b)(c) including instruction in safe equipment operation and regency response procedures, training new employees within 6 months and widing an annual training program refresher course. [3745-65-16(A)(B)(C)]	Total Production	<u> </u>		
8.	wri	facility keeps all records required by Section 265.16(d)(e) including tten job titles, job descriptions and documented employee training records.	<u>×</u>			
9.	inc	required due to the actual hazards associated with Ignitable, Reactive or compatible waste materials, the facility meets the following requirements: ection 265.17) [3745-65-17]				
	a)	Protection from sources of ignition.	X	•		
	b)	Physical separation of incompatible waste materials.			\overline{X}	
	c)	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
	d)	Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]			X	**************************************
	÷	#5,#6 Inspections of drum storage area have not be since October, 1987.	en d	ocum	entec	1

		<u>Yes</u>	<u>No</u>	N/A	<u>Remark #</u>
	Subpart C: Preparedness and Prevention				
1.	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		\overline{X}		
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) $[3745-65-32(A)(B)(C)(D)]$				INTERCOM
	a) Internal alarm ystem.	X			SYSTEM CODED ALARM TROM DRUM
	b) Access to telephone, radio or other device for summoning emergency assistance.	X			STORAGE ARE
	c) Portable fire control equipment.	文			
	d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<u>X</u>		*****	FIRE BY ADT OTHER EQUIPMENT MONTHLY INSTRUT
4.	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	\angle	·····		
5.	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	7			
7.	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			<u>X</u>	and the second second

			<u>Yes</u>	· <u>No</u>	<u>N/A</u>	Remark #
		Subpart D: Contingency and Emergency				
۱.	fire	facility has a written Contingency Plan designed to minimize hazards from e, explosions or unplanned releases of hazardous wastes (265.51) 45-65-52(A)(B)(C)(D)(E)] and contains the following components:				
	a)	Actions to be taken by personnel in the event of an emergency incident.	X	·		
	b)	Arrangements or agreements with local or state emergency authorities.	又		******	
	c)	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			-
	d)	A list of all emergency equipment including location, physical description and outline of capabilities.	X			
	e)	If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	\angle			
2.	bee	opy of the Contingency Plan and any plan revisions is maintained on-site and has n submitted to all local and state emergency service authorities that might be uired to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	$\overline{\chi}$			6/23/86
3.		plan is revised in response to facility, equipment and personnel changes failure of the plan. (265.54) [3745-65-54]	X			
4.	fam	emergency coordinator is designated at all times (on-site or on-call) is illiar with all aspects of site operation and emergency procedures and has the hority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X			
5.	all	an emergency situation has occurred, the emergency coordinator has implemented or part of the Contingency Plan and has taken all of the actions and made all the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			X	***************************************

•			<u>Yes</u>	· <u>No</u>	N/A	Remark #
		Subpart E: Manifests/Records/Reporting				
<u>NOTE</u>	:	THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO \underline{BOTH} ON-SITE AND OFF-SITE TREATMENT DISPOSAL FACILITIES.	, STO	RAGE A	ND	
		e operator maintains a written operating record at his facility as required by ction 265.73 [3745-65-73(A)] which contains the following information:				
	a)	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(l)) [3745-65-73(B)(l)]	X			***************************************
	b)	Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	X			
	c)	The estimated (or actual) weight, volume or density of the waste material(s).	\succeq			
1	d)	A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	×			
	e)	The present physical location of each hazardous waste within the facility.	\times			
	f)	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			$\underline{\times}$	
	g)	Records of any waste analyses and trial tests required to be performed.	X			
	h)	Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements — Subpart B).	-	X		
	1)	Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]	X			
	j)	Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	$\not\supset$			

		<u>Yes</u>	<u>No</u>	N/A	Remark #
2.	The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<u> </u>	101111 1011111		<u></u>
NOT	E: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE	AND DISI	POSAL	FACILII	TIES.
3.	Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	又	<u> </u>		
	a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			X	
	b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<u>×</u>	-		
4.	Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			X	When the state of
5.	If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director	•		V	
	within 15 days. [3745-65-76(A)]			<u> </u>	

			<u>Ye s</u>	. <u>No</u>	NZA	Remark_#
		Subpart G: Closure and Post-Closure				
NOT	<u>E</u> :	THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACT	LITIE	s.		
١.		written Closure Plan is on file at the facility and contains the following ements: (Section 265.112) [3745-66-12]	<u> </u>			
	a)	A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	$\overline{\chi}$	_		
	b)	A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.		文		#7
	c)	An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)		X		#7
	d)	A description of steps taken to decontaminate facility equipment.		X		#7
•	e)	The year closure is expected to begin and a schedule for the various phases of closure.		×		#7
2.		e Closure Plan has been amended within 60 days in response to any changes facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]	<u>-</u>		X	
3.		e Closure Plan has been submitted to the Regional Administrator/Director Didays prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			\times	
#	<i>‡</i> 7	Closure plan has been disapproved (letter dated 1/17/89). Several deficiencies noted in letter.				,
		Down storage area drains to storm sewer that discharge (Not included in plan).	jes	to a	a cre	eck.
•		Methylene chloride not included in Plan.				
e		CLOSURE AND POST-CLOSURE - 1				

		<u>Yes No</u>	N/A	Remark #
	<u>Subpart II: Financial Regulrements</u>			
1.	The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]	NOT EVAL	VATED	
	a) A closure trust fund, or	, 1		
	b) A surety bond, or			
	c) A closure letter of credit, or			
	d) A combination of financial mechanisms.			
2.	A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?	\$ 76,570	<u> </u>	
3.	When was the most recent estimate made?	<i>3 88</i> _	-	
4.	A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?		<u>×</u>	
5.	When was the most recent estimate made?		_ ×	

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

FINANCIAL REQUIREMENTS - 1

Subpart I: Management of Containers

		163	WO.	11/1	Mening 1 K	
١.	Hazardous wastes are stored in containers which are:					
	a) Closed (265.173) [3745-66-73(A)]	$\overline{\times}$				
	b) In good physical condition (265.171) [3745-66-71]	\overline{X}				
	c) Compatible with the wastes stored in them (265.172) [3745-66-72]	\times				
2.	Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	\times				
3.	Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	X				
4.	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	n 	\times		#8	
5.	Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	$\overline{\times}$				
6.	Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]		X			
		,	,		0// //	⁄ 20

#8 Inspections of drum storage area have not been documented since October, 1987.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: _	GENERAL E	LECTRIC COM	PANY, RA	VENNA	LAMP PL	ANJ
U.S. EPA I.I	D. No.: 0HT	059 06	51 317			
Street: _	6800 N.	CHESTNUT	ST.			
City: <u>Î</u>	RAVENNA	State:	H	Zip Cod	e: 44266.	-3907
Telephone:	216	297 086	1			•
Operator:	(SAME)					
Street: _				· · · · · · · · · · · · · · · · · · ·		
City: _		State:		Zip Cod	e:	
Telephone:					<u> </u>	
Owner: _	(SAME)					
Street: _						
City: _		State:		Zip Code	e:	
Telephone:		•				
Inspection D	Date: 1 /23/89 Tir	ne: 9:30AM 1.45 f	M Weather Condi	ions: WA	EM, DRY	
	<u>Name</u>	Affiliation	<u>1</u>	Telephor	<u>16</u>	
Inspectors:	ANDREA D.	AKOSKI O	HO EPA	216	425 9171	
		OER OF				
Facility Rep	resentatives:	JAMES MA	SELLA P	OUECTE	NGINEER	
				216	297086	1
	RCRAS	tatus <u>F-Solvent</u>	LDR Stat Californi		First Third	
Generator	X	<u>×</u>	X			
Transporter				· · · · · · · · · · · · · · · · · · ·		
Treater			<u> </u>			
Storer	X	<u>X</u>				
Disposer						

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

				Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-S</u>	olvent Wastes						
	1.	F001		<u>×</u>		<u>×</u>		
	2.	F002		X		X		
	3.	F003		<u>X</u>		\times		
	4.	F004			·			
	5.	F005						
			Appendix classifying			her the fac	ility is	
			;.					
В.	Cali	ifornia List Wasi	tes		No			
	1.	Liquid hazardo any solid or sla concentrations	udge) that (contains th	e followin	g metals at		
				Gen.	Treat	Store	Disp.	Trans.
		Arsenic	500 mg/L					
		Cadmium	100 mg/L					
		Chromium VI	500 mg/L		·			
		Lead	500 mg/L	·				
		Mercury	20 mg/L		************			
•		Nickel	134 mg/L					
		Selenium	100 mg/L	******				
		Thallium	130 mg/L					-

2.	Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L
	Gen. Treat Store Disp. Trans
3.	Liquid hazardous waste that has a pH of less than or equal to 2.0
4.	Liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 ppm
	Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes? Yes No NA
	If yes, state reasons for mixing:
5.	Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)
	Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.
	Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

First Third Wastes NA C.

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

		Gen.	Treat	Store	Disp.	Trans.
F006*						
F007			-			
F008						
F009						*****
F019						
K001*						
K004*					<u></u>	
K008*						
K011				<u> </u>		<u></u>
K013						
K014						·····
K015*						
K016*						
K017						
K018*			***************************************	-	<u></u>	
K019*						
K020*						
K021*	**					
K022*						
K024*				-		
K025*						
K030*	:		·		· · ·	
K031						
- K035						
K036*					+	
K037*						
K044*						
K045*						
K046*				-		
		5			Revise	d 9-26-88

		Gen.	Treat	Store	Disp.	Trans.
K047*						
K048*						
K049*			-	***************************************		
K050°						
K051*						
K052*						
K060*					 ,	
K061*				~		
K062*	*					
K069*						
K071*						
K073*						
K083*						
K084						
K085	•					
K086*	•					
K087*			A.,			
K099*						
K100*					<u></u>	
K101*		ميسيسست				
K102*			***************************************			
K103*						
K104*			<u> </u>			
K106*						
P001						
P004		-W				
P005						
P010				******		
P011						
P012						
P015						
P016						
P018						

		Gen.	Treat	Store	Disp.	Trans.
P020						
P030						
P036						
P037						
P039						
P041						
P048						
P050						
P058						
P059				 -		
P063						
P068						
P069						***************************************
P070						
P071	• •					
P081						
P082						
P084						
P087						
P089						·
P092						
P094						
P097						
P102						
P105						
P108						
P110						
P115						
P120			-			
P122						
P123						
U007						
U009	•					

		Gen.	Treat	Store	Disp.	Trans.
U 010						
U012						
U016						
U018 -						·
U019						
U022						
U029						
U031						
U036						 -
U037				<u> </u>		
U041			 			
U041						
U044				•••••		
U046						
U050						
U051	,					
U053						
U053			<u> </u>			
U063						
						
U064 U066						
						
U067						
U074						
U077						
U078						
U086	. •		***************************************			
U089						
U103				·····		
U105						***************************************
U108			*****		•	
U115						
U122						
U124						

		Gen.	Treat	Store	Disp.	Trans.
U129			************			
U130						
U133		************				
U134						
U137						
U151		. 		****		
U154						
U155						***************************************
U157						
U158						
U159						
U171						
U177						
U180						
U185	•	-m-t				
U188			**************************************			
U192			<u> </u>			
U200		<u> </u>				
U209						
U 210						
U211						
U219		·				
U220		**************************************				
U221						
U223						
U226						
U227	,					
U228						
U237						
U238					•	
U248						
U249						
- •						

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

If	<u>X</u> Yes No NA
If	
	yes, check the appropriate treatability group.
*******	Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing
X	spent methylene chloride All other spent solvent wastes
	difornia List Wastes: Does the generator correctly determine appropriate treatment standard of the waste?
a.	concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	Yes No NA
	If yes, specify the method:
b.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?
	Yes No NA
	If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

		Yes	No	⊥× NA
	If yes, check the appr	ropriate treats	ability group.	
	Wastewater filterable s Nonwastew	olids)	6 TOC by weig	ht and less than 1%
	List the waste code as	nd check the	correct treatme	nt standard group.
	Waste Code	Wastewa	ter	Nonwastewater
				
Was	ste Analysis	•		
1.	F-Solvent Wastes		No. 5.	
	a. Does the general exceeds treatmen		whether the F-	solvent waste
		.1	No	NA
	How was this de			
	- Knowledge	of waste		
		Yes	No	
	how this is	adequate. W	data available IASTE CHARAC MANAGEMEN	for review? Describe TELIZATION BY
			. 1	
•	- TCLP	Yes	X No	

	b.	treatment standards upon generation [268.7(a)(2)]?
		Yes No NA FOOT TRICHLOROETHYLENE If yes, specify the waste stream: FOOZ METHYLENE CHLORIDE FOO3 ACETONE Does the generator dilute the Fesolvent waste as a substitute for
		If yes, specify the waste stream: FOOZ METHYLENE CHLORIDG FOO3 ACETONE
	c.	adequate treatment [268.3]?
		Yes No NA
	đ.	How does the generator test F-solvent waste when a process or waste stream changes? NO PROCESS CHANGES, BUT ADDRESSED IN WASTE ANALYSIS
2.	Cali	fornia List Wastes
	a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
		Yes X No NA
	b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
		Yes No NA
		What type of absorbent is used? Check the types of waste to which absorbent is added. Liquid hazardous waste having a pH less than or equal to 2
		Liquid hazardous waste containing metals Liquid hazardous waste containing free cyanides
	c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
		- Knowledge of wastes Yes No NA

TINU

	- Testing	Yes	No	<u></u> ✓ NA
	If yes, lis	st test method used	d:	
d.		rator determine if cyanide and meta		evels in the PFLT n levels?
		Yes	No	<u></u> ✓ NA
		st test method used at exceeded prohib		nt and concentration
e.	Does the generateatment [268	rator dilute the wa	aste as a substit	ute for adequate
	- ·	•	× No	NA
Fir	st Third Wastes:	Yes	-/- - · ·	
a.		rator correctly det	ermine the app	ropriate treatment
		Yes	No	NA
	Note: The tro	eatment standards	for first third	wastes are given in
b.		rator determine w dards upon genera		Third waste exceed
U.		Yes	No	Soft hammer
υ.				
υ.	If yes, specify	the waste stream:		
υ.	•	the waste stream:		
	How was this			
	How was this	determination mad	de?	

			- TCLP
			Yes No NA
			- Total Constituent Analysis
			Yes No NA
			Provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		c.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
			Yes No NA
		d.	How does the generator test the waste when a process or waste stream changes?
			`
			No.
c.	<u>Man</u>	agem	<u>ent</u>
	1.	On-	Site Management
			estrict waste or waste that exceeds the treatment standards ted, stored, or disposed on-site?
			Yes No
		If y	es, the TSD Checklist must be completed.
	2.	Off	-Site Management
		a.	
-			Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
•			treatment standards to an off-site treatment or
-		b.	treatment standards to an off-site treatment or storage facility?

	Does notification contain the following?		
	EPA Hazardous waste number(s)	📉 Yes	No
	Applicable treatment standards	\times Yes	No
	Manifest number	\times Yes	No
	Waste analysis data, if available	X Yes	No
I -	dentify off-site treatment or storage face GOLD SHIELD, EVLLID	ilities: HUKIL	L, BEDFOR
	Does the generator ship any waste that n reatment standards to an off-site dispose	al facility?	
	Yes No)	
	Does the generator provide notification a sertification to the disposal facility [268.		
	Yes No	, NA	
Ι	Ooes notification contain the following?	NA	
	EPA Hazardous waste number(s)	Yes	No
	Applicable treatment standards	Yes	No
	Manifest number	Yes	No
	Waste analysis data, if available	Yes	No
	Certification that the waste meets treatment standards	Yes	No
I	dentify off-site land disposal facilities:		

	i.	If yes, does the notification contain the	following inform	nation? NA
		EPA Hazardous waste number	Yes	No
		The corresponding treatment standards and all applicable prohibitions	Yes	No
		Manifest number	Yes	No
		Waste analysis data, if available	Yes	No
		Date the waste is subject to the prohibitions	Yes	No
	j.	Does the generator retain copies of all no	otices and certifi	cations for
		a period of 5 years?	Yes	_X_ No
D.	<u>Demonstra</u>	ation and Certification "Soft Hammer"	Wastes NA	•
	a.	Has the generator attempted to locate an and recovery facilities that provide treat greatest environmental benefit [268.8(a)(1	ment that yields	
	b.	Has the generator submitted to the Regio demonstration and certification containing to document its efforts to locate practical	ng the following	information
		A list of facilities and facility officials contacted?	Yes	No
		Addresses	Yes	No
		Telephone Numbers	Yes	No
		Contact dates	Yes	No
		Attach a copy of the demonstration	and certification	n
•	c.	If the generator has determined that ther treatment for its wastes, has it sent documents demonstrating why it was not able to obte for the waste? Yes No	mentation to EPA ain treatment or	A
		If yes, attach a copy of written discussion	n.	

	d.	Does th	he generator ship his waste off-site for treatment?	
			Yes No	
		Describ	be the type of treatment and treatment facilities	
	c.		e generator send a copy of its demonstration and certific receiving facility with the first shipment of waste?	ation
			Yes No	
	f.		ne generator provide certification with each subsequent nt of wastes?	
			Yes No	
	g.		ne generator provide the following notification to the ng facility with each shipment of waste?	
		(i)	EPA Hazardous waste number Yes	_ No
		(ii)	Manifest number YesYes	_ No
		(iii)	Waste analysis data, if available YesYes	_ No
	h.		ne generator retain copies of all notices, demonstrations, cations for a period of 5 years?	and
			Yes No	
E.	(i.c., boile	rs, furna	RCRA 264/265 Exempt Units or Processes aces, distillation units, wastewater elementary neutralization, etc.)	
			nt residuals generated from units or processes exempt 264/265? YesNo	
	If ye		ypes of waste treatment units and processes: NTARY NEUTRALIZATION	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TR.	ANSPORTER REQUIREMENTS U
Α.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	Yes No
	If yes, check the appropriate regulatory status: Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
B.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
C.	Is the waste treated in an exempt treatment process on-site?

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS	TSD	REQ	UIR	EME	INTS
------------------	-----	-----	-----	-----	------

A.

1.		es the waste anal- uirements [264.13		r Part 268	
	o I	F-solvent	Yes	<u> </u>	NA
	٥ (California List			NA
	o I	First Third	Yes	No	X NA
2.		es the facility ob stes and residues?		ative chemical a	nd physical analyses of
			X Yes	No	
	a.	What date was	the waste and	alysis plan last r	evised? 1983
	b.	Are analyses c			
				On-sit	e X Off-site
		Identify off-si	te lab: CHEA	•	MANAGEMENT
	c.	Identify off-si		AICAL WASTE	
	c.		aste analyzed	AICAL WASTE	MANAGEMENT
	c. d.	Is F-solvent was	aste analyzed Yes waste analyze r the objective	using TCLP? No d using the anale of the specifier	MANAGEMENT
		Is F-solvent was Is First Third appropriate for	aste analyzed Yes waste analyze r the objective alysis for destriction technology	using TCLP? No d using the anale of the specifier	NA ytical method that is d BDAT (i.e., total gies and TCLP for
		Is F-solvent was Is First Third appropriate for constituent and stabilization/fi	waste analyzed Yes waste analyze r the objective alysis for destrict ixation technology Yes appropriate a stituent) for f	using TCLP? No d using the anale of the specified ruction technoloplogies)? No enalytical method	NA ytical method that is d BDAT (i.e., total gies and TCLP for NA ds (TCLP or total with specified treatment

	3.	Are the operating records, including analyses and quantities, complete [264.73/265.73]?
		Yes No
В.	Sto	rage (268.50)
	1.	Are restricted wastes stored on-site?
		Yes No
		If no, go to C, Treatment.
	2.	If yes, check the appropriate method.
		Tanks Containers
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
		<u> </u>
		CHECKLISTS KEPT WITHEACH DRUM
•		EACH DRUM MARKED WITH LABEL SHOWING CONTENTS
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
		Yes No
	5.	Do operating records agree with container labeling?
		Yes No NA
	6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?
		Yes X No

7.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? Yes No
	If yes, state how:
8.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes NoNA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?
	Yes No
9.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? Yes No NA
Tre	<u>atment</u>
1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No
•	If no, go to D, Treatment in Surface Impoundments.

C.

analysi (for tre	ne facility, in s plan, deter atment stand extract) from	mine wher dards expr	ther the	e residi	entratio	sidue extrons in the	ract
	nt standards		-		30 1000		
		Y	cs		No	NA	
Is dilut	ion used as	a substitut	te for t	reatme	nt?		
		Y	cs	<u>X</u>	No		
applica	tifications, d ble) prepared ng record?	i by the g	enerato	ors kep	t in the	facility's	
		Y	es	×	No.	NA	
	ne facility sh ent standards						neets the
		Y	es	\times	No		NA
	does the trea				notifica	ation and	
		Y	es		No		
If yes,	does notifica	tion cont	ain the	follow	ing?		
E:	PA Hazardoi	is waste n	umber(s)		Yes	
Α	pplicable tre	atment sta	ındards	i		Yes	1
М	anifest num	ber				Yes]
W	aste analysis	data, if a	vailabl	ic		Yes	1
C	ertification t eatment stan		aste me	ets the		Yes	1

	8.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
		Yes No NA
		If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
		Yes No
D.	Tre	atment in Surface Impoundments NA
	1.	Are restricted wastes placed in surface impoundments for treatment?
		Yes No
		If no, go to E, Land Disposal.
	2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
•		Yes No
	3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
		Yes No NA
	4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
		Yes No
		Attach test results.
	5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?
		Yes No

	es the operating record adequately document the results waste analyses performed in accordance with 268.41?
	Yes No
	the hazardous waste residues exceed the treatment adards (268.41) or do not meet the prohibition levels?
	Sludge Yes No
	Supernatant Yes No
a.	If yes, are sludge and supernatant removed adequately on an ann basis?
	Yes No
b.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
	YesNo
c.	Are residues subsequently managed in another surface impoundment?
	Yes No
d.	Are residues treated prior to disposal?
	Yes No
	If yes, are waste residues treated on-site or off-site?

E.	Land	I Disposal NA
	1.	Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?
		Yes No
		Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.
		If yes, specify which units and what wastes each unit has received:
	2.	Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?
		Yes No
	3.	Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?
		Yes No
	4.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?
		Yes No
		If yes, at what frequency?
	5.	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?
•		Yes No
	6.	Does the facility dispose of restricted wastes that are subject to a national capacity variance?
		Yes No

•	disposed wastes that are subject to a national capacity variance, case-by- case extensions [268.5], or no migration petitions [268.6]?				
	Yes No NA				
•	What is the volume of the restricted wastes disposed of to date?				
€.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?				
	Yes No NA				

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1.	Does the handler generate any of the constituents (i.e., spent halogenated so degreasing) as a result of being used in pure form or commercial grade?	olvents used in	er
	tetrachloroethylene	Yes	_No
	trichloroethylene		No
	methylene chloride		_No
	1,1,1-trichloroethane	Yes	N
	carbon tetrachloride		_No
	chlorinated fluorocarbons		_No
<u>-</u>	Does the handler generate any of the constituents (i.e., spent halogenated so being used in the process either in pu commercial grade?	lvents) as a result (of
	tetrachloroethylene	Yes	_No
	trichloroethylene	Yes	_
	methylene chloride		_No
	1,1,1-trichloroethane	Yes	
	chlorobenzene	Yes	
	trichlorofluoromethane		 _No
	1,1,2-trichloro-1,2,2-trifiuoroethane		No
	ortho-dichlorobenzene		_No
.	Does the handler generate any of the constituents (i.e., spent nonhalogenated result of being used in the process eith commercial grade?	i solvents) as a	•
	xylene	Yes	No
	acetone	Yes	-
	ethyl acetate	Yes	-
	ethyl benzene	Yes	_
	ethyl ether	Yes	No
	methyl isobutyl ketone	Yes	No
	n-butyl alcohol	Yes	No
	cyclohexanone		No
	methanol	Yes	No
	If the F003 waste stream has been mix does the resultant mixture exhibit the		ic,
	characteristic?	_	No

4.	constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?					
	cresols and cresylic acid nitrobenzene	YesNo YesNo				
5.	Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?					
	toluene methyl ethyl ketone carbon disulfide isobutanol pyridine	YesNoYesNoYesNoYesNoYesNo				
6.	Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties — that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.					
	(a) Are the constituents used as ch	emical carriers?YesNo				
	If yes, list the constituents.					
	(b) Are the constituents used for d	legreasing/cleaning?YesNo				
	If yes, list the constituents.					
	(c) Are the constituents used as di	luents?YesNo				
	If yes, list the constituents.					
	(d) Are the constituents used as ex	tractants?YesNo				

	(e) Are the constituents used for fabric scouring? YesNo					
	If yes, list the constituents.					
	(f) Are the constituents used as reaction and synthesis media	a?				
	If yes, list the constituents.					
	he responses to questions 1 through 6 led the inspector to eve that the waste may be an F-solvent, answer question 7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise					
	reprocessed.) YesNo					
8.	If the waste is a mixture of constituents as determined in questions I through 6, give the concentration before use of all constituents in the solvent mixture/blend. For example:	<u>ll</u> th				
	5% methylene chloride					
	2% trichloroethylene					
	25% 1,1,1-trichloroethane 68% mineral spirits 100%					
	If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.					
	With remost to the E002 colvent waster if hefore we the					
	With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:					
	waste stream is mixed and contains only F003 constituents, it					
	waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:					

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene	(F003)
12%	TCE	(F001)
<u> 38%</u>	mineral	spirits
100%		

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B TREATMENT STANDARDS FOR F-SOLVENTS

	CONCENTRATION (IN MG/L)		
F001-F005 SPENT SOLVENTS	WASTEWATERS	OTHER WASTES	
Acetone	0.05	0.59	
N-butyl	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	.05	.96	
Chlorobenzene	.15	.05	
Cresols (and cresylic acid)	2.82	.75	
Cycohexanone	.125	.75	
1,2-dichlorobenzene	.65	.125	
Ethyl acetate	.05	.75	
Ethyl benzene	.05	.053	
Ethyl ether	.05	.75	
Isobutanoi	5.0	5.0	
Methanol	.25	.75	
Methylene chloride	.20	.96	
Methylene chloride (from the pharmaceu	tical		
industry)	0.44	.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	.33	
Nitrobenzene	0.66	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	
1,1,1-Trichloroethane	1.05	0.41	
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

2.	Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L	
	Gen. Treat Store Disp. Tr	ans.
3.	Liquid hazardous waste that has a pH of less than or equal to 2.0	
4.	Liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 ppm 500 ppm Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes? YesNoNA	
	If yes, state reasons for mixing:	
5.	Hazardous waste that contains HOCs greater than or equal to 1,000 mg/(liquids) or 1,000 mg/kg (solids)	L
	Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.	
	Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater the or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.	an



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road Twinsburg, Ohio 44087-1969 (216) 425-9171



Richard F. Celeste Governor

July 7, 1989

RE: GENERAL ELECTRIC COMPANY
RAVENNA LAMP PLANT
OHD 059-061-317

Mr. James Magella General Electric Company Ravenna Lamp Plant 6800 North Chestnut Street Ravenna, Ohio 44667

Dear Mr. Magella:

I am pleased to inform you that this Agency currently considers General Electric Company in Ravenna to have returned to compliance with applicable Ohio hazardous waste regulations. The documentation in your May 19, 1989 and July 4, 1989 letters show that the violations found in the January 23, 1989 inspection have been corrected. Please be advised that past instances of non-compliance can continue as subjects of pending or future enforcement actions because they constitute violations of the Ohio Revised Code, Chapter 3734.

If you have any questions, please call me at (216) 425-9171.

Sincerely,

Andrea Dakoski

Environmental Scientist

andrea Dakoski

Division of Solid and Hazardous Waste

Management

AD/sp

cc: Debby Berg, DSHWM, NEDO

Dave Sholtis, RES, Central Office

GENERAL (28) ELECTRIC

HIGH INTENSITY & QUARTZ LAMP DEPARTMENT RAVENNA, OHIO 44266

Ravenna Lamp Plant #3949

SUBJECT

SENT TO:

LAND DISPOSAL RESTRICTIONS

FILE

NO.

WASTE ANALYSIS PLAN

VCKNOMPEDGHERA OL	A HAZARDOUS	Waste <mark>su</mark>	LIPHENT THAT E	RESTRICTED FROM LAND DISPOSAL
GENERATOR:				MANIFEST #:
ADDRESS:			- S	BPA 1:
1. Table CCWE-Constituent in Waste	Extract 40 CFR	268.41		SATE OF SHIPMENT:
Concentration (in mg/l) Co	ncaining S	11 Other pent olvent		Liguid hazardous wastes having a pH less than or equal two
		astes	,	(2.0);
Acetone	0.05	0.59	☐ (2)	Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm;
□ n-Butyl alcohol □ Carbon disulfide □ Carbon tetrachloride	5.0 1.05 .05	5.0 4.81 .96	□ o	Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1,000 mg/1 and less than 10,000 mg/1
Chlorobenzene Cresols (and cresylic acid)	.15 2.82 .125	.05 .75 .75		"Gelifornia List" RCRA Section 1004(d)
☐ Cyclohexanone ☐ 1,2 Dichlorobenzene ☐ Ethyl acetate	.65 .05	.125 .75		Liquid hazardous vestes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations
☐ Ethylbenzene ☐ Ethyl ether ☐ Isobutanol	.05 .05 5.0	.053 .75 5.0	TI m	greater than or equal to 1.000 mg/1. Liquid hexardous wastes, including free liquids associated with
☐ Hethanol ☐ Hethylene chloride	.25 2.0	.75 .96		any solid or sludge, containing the following metal (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to those specified below:
 ☐ Hethylene chloride (from the pharmaceutical industry) ☐ Hethyl ethyl ketone 	12.7 0.05	.96 0.75		(i) arsenic and/or compounds (as As) 500 mg/l: (ii) cadmium and/or compounds (as Ed) 190 mg/l:
☐ Methyl isobutyl ketone ☐ Nitrobenzene ☐ Pyridine	0.05 0.66 1.12	0.33 0.125 0.33	•	(iii) chromium (VI and/or compounds (am Cr VI) 500 mg/l: (iv) land and/or compounds (am Ph) 500 mg/l: (v) mercury and/or compounds (am Hg) 20 mg/l:
Tetrachioroethylene	0.079 1.12 1.05	0.05 0.33 0.41		(vi) nickel and/or compounds (as H1) 134 mg/l: (vii) selenium and/or compounds (as Sc) 100 mg/l: and (viii) challium and/or compounds (as Th) 130 mg/l.
 ☐ 1,1,1-Trichloroethane ☐ 1,1,2-Trichloro-1,2,2-trifluçoethane ☐ Trichloroethylene ☐ Trichlorofluoromethane ☐ Xylene 		0.96 0.091 0.96 0.15	a restricts	other waste conforms to the description of and is identified as d waste. It must meet the treatment standards noted shows before se for disposed in a secure land fill. This notification is based one)
F020-F023 and F026-F028 Wastes	Concentration		Attached	enelysis
 ☐ HxCDD-All Hexachlorodthenzo-p-dioxins ☐ HxCDF-All Mexachlorodthenzofurans ☐ PeCDD-All Pencachlorodthenzo-p-dioxins 	< 1 ppb P			
PeCOF-All Pentuchlorodibenzofurans TCDD-All Tetrachlorodibenzo-p-dioxins TCDF-All Tetrachlorodibenzofuranz				
☐ 2,4,5-Trichlorophenol ☐ 2,4,6-Trichlorophenol ☐ 1,3,4,5-Tetrachlorophenol ☐ Pentachlorophenol	< 0.05 ppm < 0.05 ppm < 0.10 ppm < 0.01 ppm			

Form I

DATE ISSUED ISSUED BY SUPERSEDES ISSUE DATED PAGE OF



- 2.) The drain line will be mechanically unclogged and all sediment and debris will be collected at the intersection of the terra-cotta pipe and the storm sewer, and at the location of the crack in the pipe placed during the excavation of the thirteenth.
- 3.) The drain line will then be rinsed under low pressure. The rinsewater will be collected as above. The volume of water collected will be compared with the amount of water used in the flushing operation. If the volume of water collected is sufficiently less than that used in the rinsing operation, the drain line will be uncovered to determine the location of any major leaks in the line.
- 4.) Soil sampling will be conducted as outlined in the approved closure plan. Samples will be collected at 100 foot intervals along the length of the drain line and in areas where major leaks are discovered. However, due to the depth of the drain line near its intersection with the storm sewer (approximately 13 feet deep) a drill rig will be used in this area. Samples will be collected with a split spoon sampler. The sampler will be thoroughly cleaned after the collection of each sample.

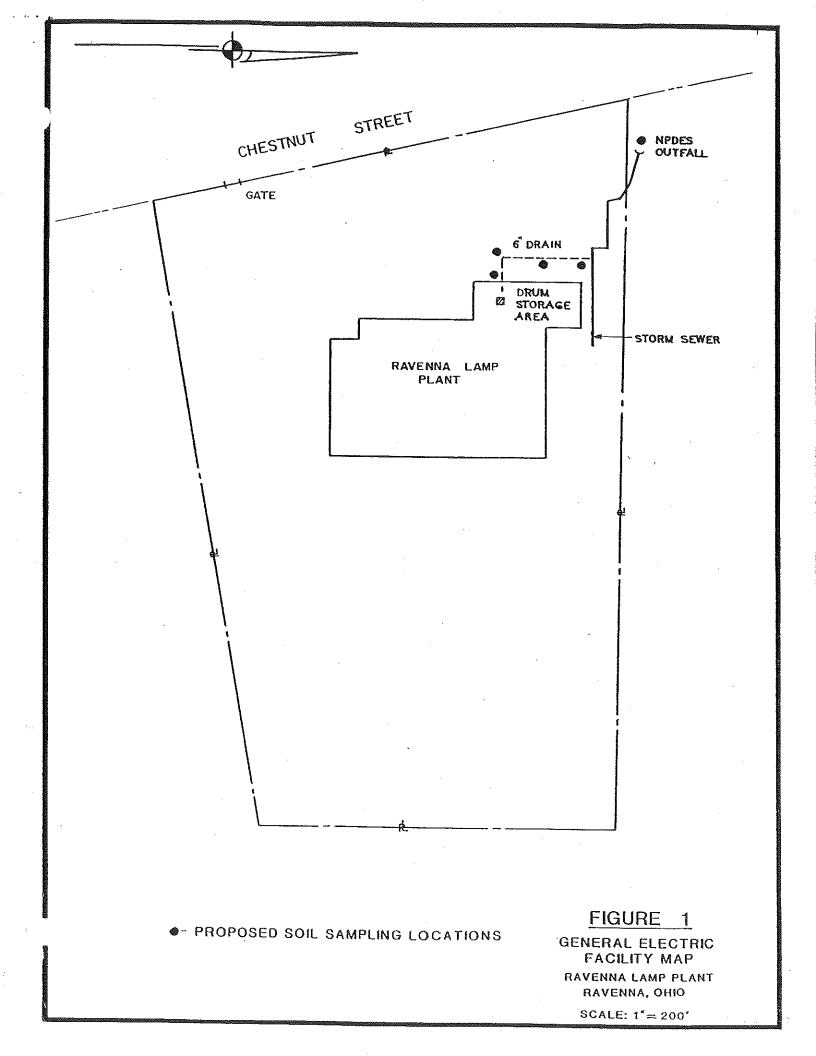
This plan will commence upon its approval by the OEPA. A Ohio licensed PE will be on-site during all critical closure activities. The attached figure indicates the location of all proposed soil sampling locations. If you have any questions regarding this information, please call me at your earliest convenience.

Very truly yours,

Scott A. Nesbit

Encl.

cc: James Magella, GE, Ravenna Lamp Donal T. Grube, GE, NELA Park Paul Vandemeer, OEPA, Columbus Rick A. Myers, PE, Killam Assoc.





January 26, 1990

DLA Division

6465 Reflections Drive, Suite 100,

Dublin, OH 43017-2353

Telephone: 614-793-0992 Fax: 614-793-0995

Ohio EPA, NEDO 2110 E. Aurora Rd. Twinsburg, Ohio 44087 Attn: Ms. Andrea Dakowski

RE: General Electric, Ravenna Plant

Dear Ms. Dakowski,

During the approved closure activity for this facility, a pipe that was to be examined was found to contain a liquid. Lab analysis show this liquid contains; Trichloroethylene and Methylene Chloride. The pipe was sealed to eliminate further leakage and excavation efforts were stopped.

On January 26, 1990, Scott Nesbit and this writer examined the area to explore possible solutions to this situation. As a result of this investigation, GE proposes to;

- 1) Until a final course of action (see items 2 thru 7 below) is agreed upon, soil excavated from the trench will be placed back in the trench. This will reduce surface run on and mitigate a potential hazard.
- Excavate from the building to the concrete drive (see Figure 1). Soil above the pipe will be stockpiled separately from soil in contact with or below the pipe. Samples will be taken from each stockpile and analyzed for VOC's (methylene chloride and trichloroethylene). If either stockpile tests above the clean level listed in the approved closure plan, it will be handled as outlined in the closure plan.
 - 3) The pipe in this area will be removed and treated as a hazardous waste.
 - An effort will be made to determine where the pipe was plugged and why it had fluid in it.
 - 5) Five (5) discrete soil samples will be taken from the soils below the pipe in the excavated area and tested for VOC's. (See Figure 1.)



Ms. Andrea Dakowski January 26, 1990 Page 2

- 6) If the pipe running under the concrete pad is not blocked, it will be flushed with water. The water will be collected and analyzed for VOC's. If the level of VOC's is below the clean levels indicated in the approved closure plan, this section of pipe will be plugged.
- 7) Soil below the pipe will be excavated until "clean" levels of VOC's are obtained.

Should you have any questions or wish to have a meeting to discuss our approach, please call me at (614) 793-0992.

Sincerely,

Joseph D. Morehart, PE

Topho Marchan

JDM/ph

cc: Donal Grube, GE Jim Magella, GE

Scott Nesbit, Killam

	SCOJECT FIGURE	. 1	INDEX NO
dla			SHEET NOOF
n, lagnese & associates, inc.	CLIENT GE RAVE	NNA	JOB NO
(412) 931-B400	COMP. BY JDM		BYDATE
PARKING / LOADING DOOKS BUILDING BUILDING LIMITS FOR EVORDANTION	#2 AND PIPE REMOVAL REMOVAL 15 GONCRETE PAD TY CONCRETE PIPE PIPE PIPE PIPE ALL PIPE ALL PIPE P	DRIVE WAY	MANHOLE # FROM PIPE" FROM PIPE" FROM PIPE" FROM OUTFALL
a Va	MAIIIIOLE #2		THE WAR

C.



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200

Fax: 412-772-1955

June 13, 1990

Onio Environmental Protection Agency Division of Solid and Hazardous Waste Management 1800 Watermark Drive PO BOX 1049 Columbus, Ohio 43266-0149

ATTENTION: Paul Vandermeer

CLOSURE PLAN MODIFICATION
GENERAL ELECTRIC - RAVENNA LAMP
OHD 059 061 317
KILLAM PROJECT NO. 2G018

Gentlemen:

The hazardous waste storage area at General Electric Company, Ravenna Lamp Plant was cleaned twice according to the approved closure plan. Samples of the floor rinseate were obtained for lab analysis with analytical results as shown in the attached table. As can be seen in the table, the rinseate from the first cleaning exceeded clean levels for both alcohol and trichloroethylene, whereas the second cleaning rinseate exceeded only for trichloroethylene.

Also included in the table are analysis results of a distilled water field blank and a sample of the city water being used for the rinse process. Both these samples were obtained during the second cleaning in May 1990. These two samples also contain concentrations of trichloroethylene.

Based on the low levels of trichloroethylene present (less than 0.005~mg/l) and the presence of trichloroethylene in the field blank and rinsing water samples, we request that the clean level be raised from analytical detection limit 0.00012 to 0.005~mg/l. This would allow the current levels to be considered clean and the closure complete.



June 13, 1990 Page Two

Regarding the drain line from the hazardous waste storage area, a revised plan is attached which describes our proposed course of action to finalize work with the soils. The revised plan is being submitted for your approval prior to proceeding with work.

Due to the difficulty described above in decontaminating the storage area to clean levels and the problems addressed in the attached revised plan, we hereby request an extension of the closure deadline to 180 days beyond the approval date of the attached revised plan.

If you have any questions, please contact me at your earliest convenience.

Very truly yours,

Kule A Myers Rick A. Myers

Senior Project Engineer

-- RAM: PRZ/4033D

cc: Ms. Andrea Dakoski - OEPA

Mr. James Magella - GE

Mr. Donal Grube - GE

Ms. Lisa Pierard - OEPA

Attachment

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1600 WaterWark Dr. Columbus, OHo 43265-0149 (614) 644-3020 FAX (614) 644-2329

George V. Voinovich Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

December 11, 1991

RE:

AMENDED CLOSURE PLAN

General Electric Company

omo 059 061 317

Mr. James Magella General Electric Company 6800 North Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

On June 25, 1990, General Electric Company submitted to Ohio EPA an amended closure plan for a hazardous waste drum storage area (Part & Permit S01, Line 1) located at 6800 North Chestnut Street, Ravenna, Ohio. The amended closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Company's proposal for closure complies with the requirements of OAC Rules 3745-66* 11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the amended closure plan of General Electric Company in accordance with OAC Rule 3745-66-12. The public comment period extended from July 9, 1990 through August 13, 1990. No comments were received by Ohio EPA in this matter.

Based upon review of General Electric Company's submittal and subsequent revisions, I conclude that the amended closure plan for the hazardous waste facility at the General Electric Company as modified herein meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The amended closure plan submitted to Ohio EFA by The General Electric Company is hereby approved with the following modifications:

I contify this to be a true and accurate copy of the THE ELECTION CONTRACT AS FIRST THE THE PROPERTY OF THE CARD . sironmental Protection Agency.

Date 12/119

OFFICE CIRC

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ENTERED DIRECTOR'S JOURNAL

Mr. James Magella General Electric Company Page Two

Closure Cost Estimate.

General Electric (GE) shall revise their closure cost estimate to conform with the additional activities being performed to complete closure. GE shall submit the updated closure cost estimate to Ohio EPA in accordance with OAC Rule 3745-66-42(A) and (B) within 15-days of the receipt of this letter.

2. Decontamination Procedures, Drain System.

GE mentions decontaminating the terra cotta drain line via low pressure washing of the line. Given the problems already associated with the clean-up of the upper section of the drain, a real possibility exists that the middle section of the pipe (from the south edge of the concrete drive, north to manhole #1) and the end section of the pipe (north of manhole #1 to manhole #2) are not sound. Terra cotta pipe tends to be porous and leak readily; therefore additional washing may exacerbate the spread of contamination.

The closure plan is hereby amended to state that soil samples shall be collected prior to washing of the pipe (see revised Figure 4 for additional sampling locations) in order to determine whether soil contamination has come from the unexcavated sections of the pipe. If contamination is evident, then the pipe shall be excavated. If contamination is not found, then washing of the pipe may commence as per the closure plan.

3. Equipment Decontamination.

GE does not specifically indicate where the "decontamination zone" is located and how this zone will contain both liquid and solid residues from decontamination of equipment. The closure plan is hereby amended to state that the decontamination area will be constructed in a similar fashion as the one shown in Attachment A.

OFFICE P.A.

DEC 11 91

ERICACO DIRECTORAS JOHANAL

I certify this to be a true and accurate copy of the initial discurrent as filed in the records of the Ohio Cavironmental Protection Agency.

By: Mackey Date 17/11/91

Mr. James Magella General Electric Company Page Three

,04

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.A. \$9601 at seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745:014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved

I cortify this to be a true and accurate copy of the efficial document as filled in the records of the Ohio Environmental Protection Agency.

By: Chiki whackey Date 12/11/91

OHO E.P.A.

DEC 11 Si

LHTERED DIRECTOR'S JOURNAL .

Mr. James Magella General Electric Company

closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerally,

Page Four

Donald R. Schregardus

Director

DRS/PV/pas

CC:

Tom Crepeau, DHWM Central File, Ohio EPA Paul Vandermeer, Chio EPA, DHWM Lisa Pierard, USEPA - Region V Joel Morbito, USEPA - Region V Murat Tukel, NEDO, Ohio EPA

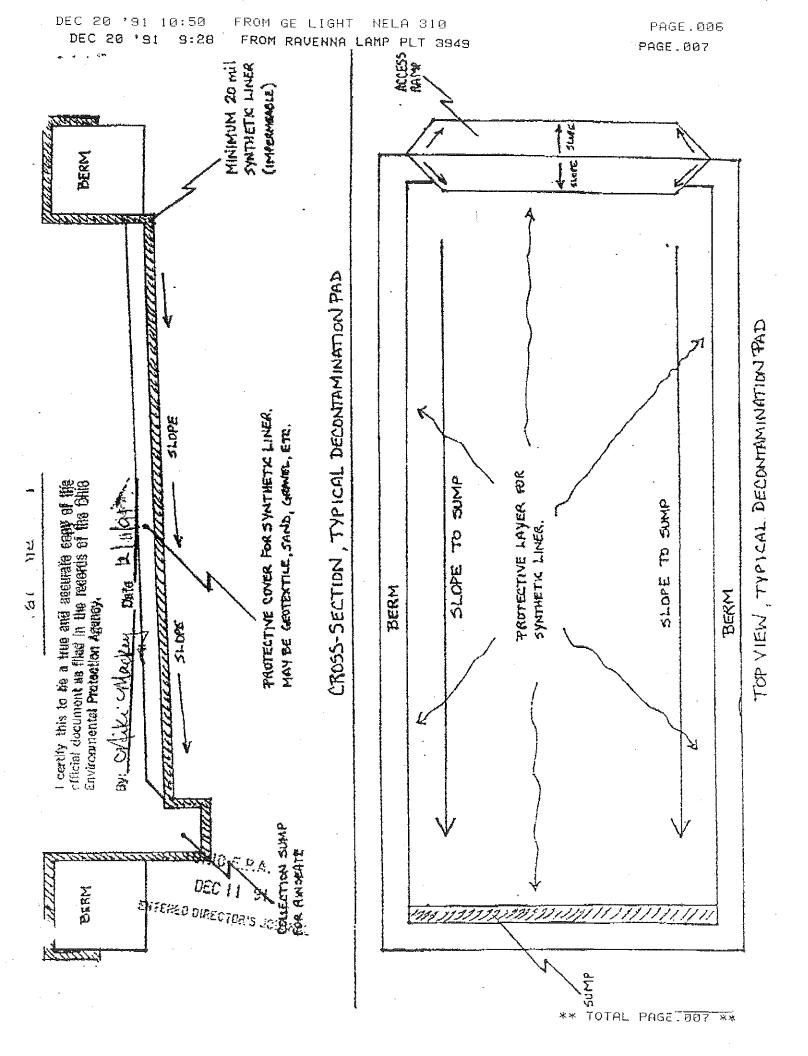
certify this to be a true and accurate copy of the Balai discussed as filed in the records of the Ohio Saviroumental Protection Agency.

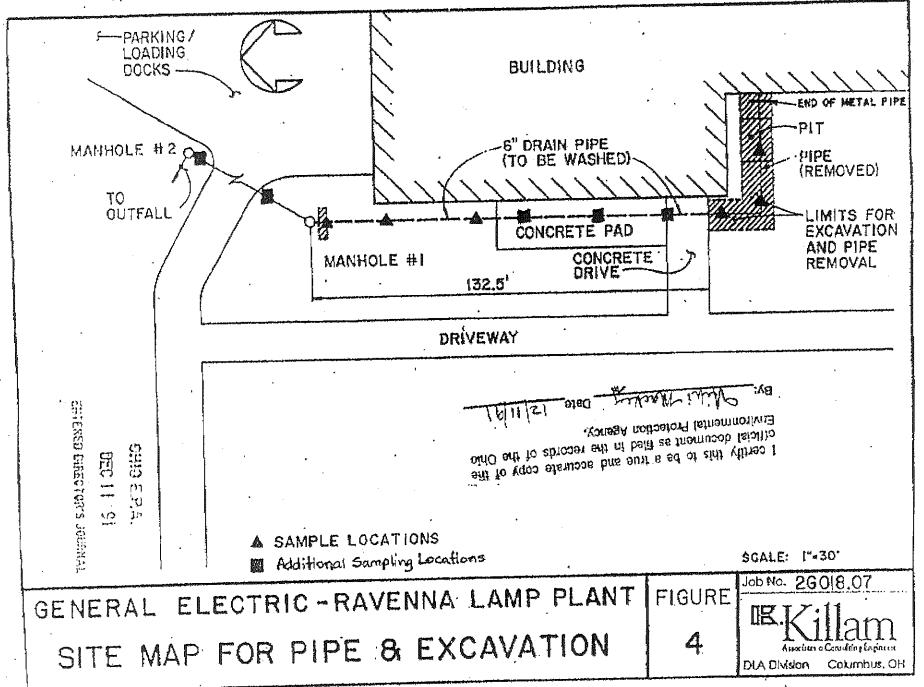
By: Wiki Chacky Date 12/11/91

OHIO E.P.A.

BEC | | 31

ENTERED DIRECTOR'S JOURNAL







GE Lighting

Discharge Production Department Pavenna Lamp Plant General Electric Company 5800 N. Chestnut St., Pavenna, On 44765 216-297-0861

2 January, 1992

Ohio Environmental Protection Agency Division of Hazardous Waste Management Data Management Section Columbus, Ohio

Attn: Tom Crepeau

Re: Amended Closure Cost (General Electric OHD 059 061 317)

The following is a cost estimate for the Amended Closure Plan submitted June 25,1990. This information is in response to your request (Item 1) from the approval letter dated December 11,1991. See attachment.

I trust the information provided will meet the requirements of your request, and should there be any questions or needs for additional information, please contact me at (216) 297~0861.

Jim Magella EHS Specialist

co: Edda Post
Don Grube
Paul Vandermeer
Lisa Pierard
Murat Tukel

RAVENNA LAMP PLANT

GENERAL ELECTRIC OHD 059 061 317

CLOSURE COST

Remove contaminated soil and pipe; replace soil; collect water in drums		20,0	000
Soil disposal	25 tons @\$200	5,0	00
Water samples (trichloroethylene, acetone, methanol, alcohol, ignitibility)	4 @\$300	1,2	:00
Soil samples (acetone,ignitibility,methanol, trichloroethylene,methylene chloride, n-butyl acetate)	6 @\$600	3,6	500
Sampling/Monitorong	20hrs @\$60	1,2	200
Reporting			500
Certification		1,:	200
•	Subtotal	. \$32,	700
ADDITIONAL COST (Item 2)			
Concrete temoval and seri excavation (pad,manholes)		30,	000
Sojl::samples		3,	000
Sampling/Monitoring		1.	440
	5.	ubtotal \$34.	440

Project total

\$67,140

MEMORANDUM

DATE:

JULY 30, 1992

T0:

FILE

FROM:

R. MYERS

SUBJECT:

GENERAL ELECTRIC - RAVENNA LAMP

OHIO EPA MEETING - JANUARY 8, 1992 KILLAM PROJECT NO. 2G038

A meeting was held at Ohio EPA Northeast District Office to discuss the Ohio EPA Closure Plan Approval dated December 11, 1991 for the General Electric Ravenna Lamp Plant facility. Attendees from Ohio EPA, General Electric and Killam Associates are listed on the attached attendance sheet.

A five page handout (attached) was distributed to provide current status of closure activities. Major items of discussion included the following:

- There were no flow measurements obtained during rinse of pipe under concrete pad. However, observed flow appeared to indicate the pipe was intact.
- There was no discoloration or odors apparent during soil and pipe excavation/removal.
- Drains in the hazardous waste storage area were plugged in 1988.
- New drain lines are to be installed to address fire protection concerns associated with flammable liquids storage.
- Based on review of handout and discussion, Vandermeer stated that Ohio EPA agreed to no further sampling. He will send an amended approval, deleting Item Number 2 of the December 11, 1991 approval.

RAM: tlk/5023B Attachment

GE - RAVENNA CLOSURE

OHIO EPA - NEDO

NAME	COMPANY	PHONE
Paul Vandermeer	Onio EPA-DHWM-C.O.	614-644-2956
DON GRUBE	GE LIGHTING	216-266-2672
Jim Mageur	CE LIGHTAPY	26-297-0861
DENNIS CORRETA	GE LICHTING	216-266-2396
Rick A Myers	Killam Assoc.	412-772-0200
PAUL DOLENSKY	Ohio EPA-DHWIM-NEOG	(216) 963-1200
MURAT TUKEL	17	11

General Electric Company Ravenna Lamp Hazardous Waste Storage Area Closure

Activities to Date

Sept	1988 -	Closure plan submitted to OEPA
Jan	1989 -	OEPA disapproval and comments
May	1989 -	Revised closure plan submitted
Jul	1989 -	OEPA conditional approval of closure plan
Dec	1989 =	Facility cleaning, pipe exposed, and leaks discovered
Jan	1990 -	Letter to OEPA requesting modifications for soils
Feb	1990 -	Trench excavation/sampling, pipe removal to concrete pad
May	1990 -	Facility recleaning
May	1990 -	Meeting with OEPA - verbal approval of plan for soils
Jun	1990 -	Revised plan for soils submitted
Aug	1990 -	Public comment period ends
Mar	1991 -	► No response from OEPA
		Excavation still open
		► GE independently initiates work

March 1991 Activities

- ► Rinse and sample at end of 6" metal pipe
- Excavate pipe between sample locations 4 & 5
- Rinse and sample terra-cotta pipe under concrete pad
- Soil samples at locations along pipe, 1 through 5
- After sample analysis indicated no soil contamination, all excavations were backfilled
- Rinse water from metal pipe is contaminated
- Plans to remove/replace pipe and sample soils under building

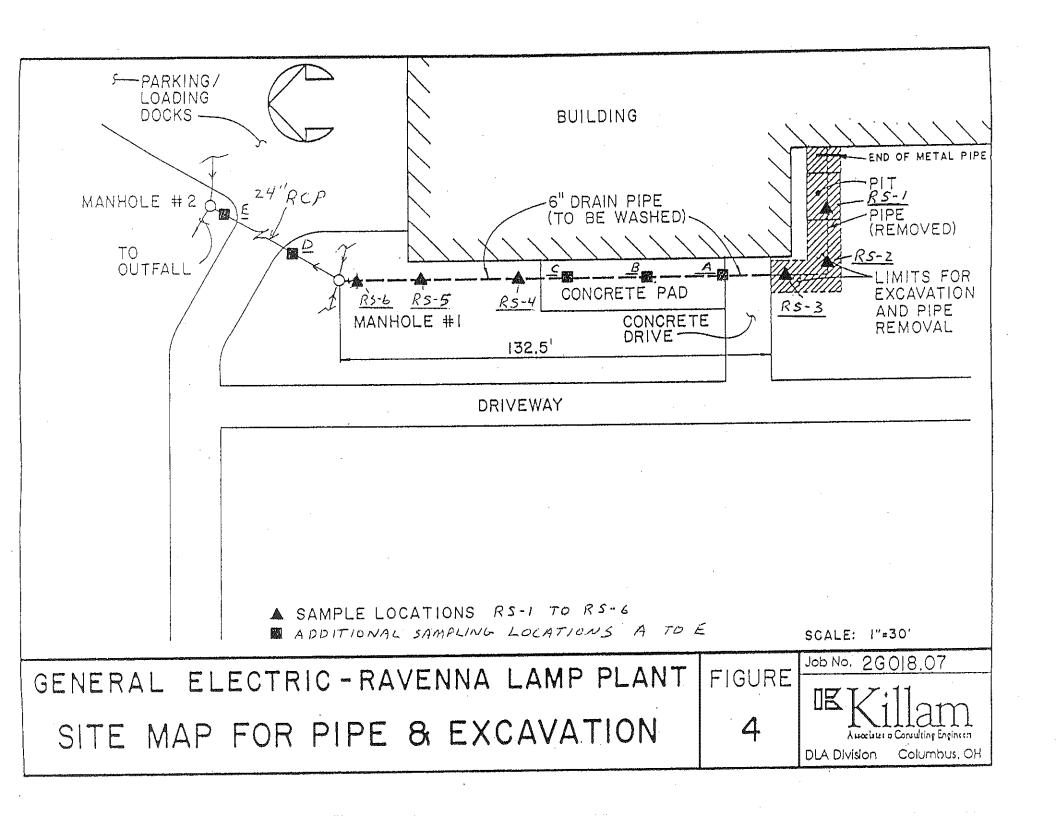
Proposed Activities

- ► Remove 6" metal pipe and replace it
- Sample soils beneath pipe and remove contaminated soils

Reasons for not taking OEPA Additional Samples

- 1. Prior excavation indicates blockage in pipe was between sample locations 1 and 2 (see Figure 4). Contamination of the soil is believed to have been confined to that area and subsequently removed.
- 2. The pipe has been removed between sample locations 4 and 5 and rinsed between 3 and 4 with no indications of residual contamination.
- 3. The other piping into and out of MH#1 is reinforced concrete. Discharge pipe is 24-inch diameter. This construction tends to provide better stability and minimizes opportunity for damage or leakage. The blocked pipe was a 6-inch terra-cotta pipe.

File/0446



GENERAL ELECTRIC RAVENNA LAMP PLANT RAVENNA, OHIO

TABLE 1
RINSEWATER SAMPLE ANALYSIS
SAMPLE DATES: MARCH 20 & 21, 1991

		DET. CLEAN		RINSE 1	RINSE 2	TAP	BLANK	DISTILLED	
PARAMETER	UNIT	LIMIT LEVEL		RW-2	RW-3	RW-5	RW-11	RW-4	
IGNITABILITY	deg F	_	> 140	105	> 200	> 200		neg.	
ACETONE	mg/l	1.0	1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
ALCOHOL	mg/I	1.0	1.0	ND	ND	ND	ND	ND	
METHANOL	mg/I	5	1.0	. ND	ND	ND	ND	ND	
TRICHLOROETHYLENE	mg/I	0.005	0.005	5.6	< 0.005	< 0.005	< 0.005	< 0.005	
METHYLENE CHLORIDE	mg/l	1		< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
]	

RINSE 1 – SIX-INCH STEEL DRAIN FROM INSIDE STORAGE PAD TO OUTSIDE

RINSE 2 – SOUTH END OF OUTSIDE STORAGE PAD TO NORTH END

GENERAL ELECTRIC RAVENNA LAMP PLANT RAVENNA, OHIO

TABLE 2
SOIL SAMPLE ANALYSIS
SAMPLE DATE: MARCH 20, 1991

DET. CLEAN		RS-1			RS-2			RS-3			
UNIT	LIMIT	LEVEL	A	В	С	A	В	С	A	В	С
deg,F		> 140	neg.	neg.	neg.	neg.	neg.	neg.	neg.	neg.	neg.
mg/kg	1	BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
mg/kg	2	BDL	ND	ND	ND	ND	ND	ND	ND	ND	ND
mg/kg	12	BDL	ND	ND	ND	ND	ND	ND	ND	ND	ND
mg/kg	1	BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
mg/kg	1	BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		< 1.0
mg/kg	0.012	BDL	ND	ND	ND.	ND	ND	ND	ND	ND	ND
	mg/kg mg/kg mg/kg mg/kg mg/kg	deg.F —— mg/kg 1 mg/kg 2 mg/kg 12 mg/kg 1 mg/kg 1 mg/kg 1 mg/kg 1	deg.F > 140 mg/kg 1 BDL mg/kg 2 BDL mg/kg 12 BDL mg/kg 1 BDL mg/kg 1 BDL mg/kg 1 BDL	UNIT LIMIT LEVEL A B C A B C A deg.F - > 140 neg. neg. neg. neg. neg. neg. neg. neg.	UNIT LIMIT LEVEL A B C A B C A B deg.F - > 140 neg. neg. neg. neg. neg. neg. neg. neg.						

PARAMETER	DET UNIT LIMI	CLEAN T LEVEL	·	RS-5				
	OIVIT EINII	1 LEVEL	A	В	С	A	В	С
IGNITABILITY	deg.F	>2,<12	neg.	neg.	neg.	neg.	neg.	neg.
ACETONE	mg/kg	1 BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
ALCOHOL	mg/kg	2 BDL	ND	ND	ND	ND	ND	ND
METHANOL	mg/kg	12 BDL	ИD	ND	ND	ND	ND	ND
METHYLENE CHLORIDE	mg/kg	I BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
TRICHLOROETHYLENE	mg/kg	1 BDL	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
N-BUTYL ACETATE	mg/kg 0:0	12 BDL	ND	ND	ND	ND	ND	ND

NOTES:

BDL - BELOW DETECTABLE LIMITS

ND - NOT DETECTED

A – ZERO INCHES TO SIX INCHES BELOW BOTTOM; B – 6" TO 12"; C – 12" TO 18"

neg - NOT IGNITABLE PER 40 CFR 261.21



General Electric Company Nete Park, Cleveland, Ohio 44112

January 8, 1992

RE: Amended Closure Plan General Electric Company OHD 059 061 317

Mr. Paul Vandermeer Ohio EPA - DHWM - C.O. P.O. Box 1049 1800 Watermark Dr. Columbus, Ohio 43266-0149

Dear Mr. Vandermeer:

This letter is to confirm the results of our meeting today at the district office of NEOEPA regarding the closure requirements which were included in the Amended Closure Plan approval letter dated December 11, 1991.

From the data and information available from the activities accomplished in March, 1991, you have agreed that the additional sampling as indicated in item 2 of the approval letter would not be required.

You have requested that General Electric Company not file an appeal to the December 11, 1991, approval letter to allow you the opportunity to withdraw the letter and reissue without item 2, or to send an amendment to the existing letter. You anticipate this may require up to two weeks.

General Electric has submitted an updated closure estimate in compliance with item 1. The closure certification will attest that the equipment decontamination was carried out as indicated in item 3. General Electric will proceed with the closure certification, having completed the requirements of the amended plan and items 1 and 3 of the subject approval letter.

Sincerely,

Donal T. Grube

GE Lighting

cc: R.N.Cotman - GE Lighting

Dennis Correia - GE Lighting

Paul Dolensky - Ohio EPA - DHWM - NEDO

Jim Magella - GE Lighting

Rick Meyers - Killam Associates

E.S.Post - GE Lighting

Murat Tukel - Ohio EPA - DHWM - NEDO

RECEIVED

과학 13 1992



State of Ohio Environmental Protection Agency

.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329 PICE MOYER

A12-772-1955

ior ius tor

rich.

February 21, 1992

Mr. James Magella General Electric Company Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266

Re: Amended Closure Plan Approval

Dear Mr. Magella:

Emma Lang Rang

On December 11, 1991, Ohio EPA approved a closure plan for closure of a hazardous waste drum storage area for the General Electric Company (GE) located at 6800 North Chestnut Street, Ravenna, Ohio. On January 8, 1992, Ohio EPA and GE representatives discussed the closure of the storage area and a terra cotta drainage pipe which led from a storage area drain to an outdoor storm sewer. A portion of this pipe contained hazardous waste constituents; however, these constituents did not migrate down the length of the pipe (as supposed by the Ohio EPA) due to a plug in the pipe. Therefore, contamination of the soils was limited to a small area just outside the building. GE has since remediated this contaminated area and provided confirmation that the pipe and soils beneath other sections of the pipe are clean (see attachment). During the meeting, it was decided by both parties that the need for additional sampling as required in the approval letter was no longer necessary as the cleanliness of the drain pipe had been confirmed.

I hereby amend the December 11, 1991 closure plan approval letter to delete modification number 2 requiring additional sampling of soils underneath the drain line as (1) this sampling will serve no useful purpose in demonstrating the cleanliness of the soils or pipe and (2) place an unwarranted burden on the company to obtain these samples in areas where access is limited.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

Mr. James Magella General Electric Company Ravenna Lamp Plant Page Two

Thank you for your patience in this matter. If you have any questions, please direct them to Paul Vandermeer of the Division of Hazardous Waste Management (614-644-2956) or Murat Tukel, Northeast District Office (216-425-9171).

Sincerely,

Donald R. Schregardus FOR

Director

cc: Paul Vandermeer, Ohio EPA, DHWM

Murat Tukel, Ohio EPA, NEDO

EXHIBIT B

CORRESPONDENCE NUCLEAR REGULATORY COMMISSION

duncan, lagnese & associates, inc.

3185 BABCOCK BOULEVARD, PITTSBURGH, PA. 15237 ELEPHONE: (412) 931-8400 • (412) 364-5403

consulting engineers

da

March 9, 1989

Ms. Evelyn Matson Material Licensing Section United States Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

RE: GENERAL ELECTRIC
RAVENNA LAMP PLANT
RCRA CLOSURE OF DRUM STORAGE AREA
NRC REQUIREMENTS - CLEAN LEVELS
DLA PROJECT NO. 2G018.07

Dear Ms. Matson:

The following letter is sent in order to verify the information that we discussed in our phone conversations regarding the closure of a drum storage unit at the General Electric, Ravenna Lamp Plant located in Ravenna, Ohio. The "clean levels" listed below were established for the documentation forwarded by the Nuclear Regulatory Commission and have been incorporated into a revised closure plan for the unit submitted to the Ohio Environmental Protection Agency.

Sample Type	<u>Clean Level</u>
Smear Sample	200 dpm/100 cm ²
Rinseate Sample	6 X 10 ⁻⁵ uCi/ml
Soil Sample	10 pCi/gm

These "clean levels" will be used to determine the adequacy of closure of this storage unit in accordance with RCRA and OEPA requirements. The decontamination of the unit in this manner will have no effect on the licensing and permitting requirements established by the NRC for the operations at the plant.

Ms. Evelyn Matson March 9, 1989 Page Two

If you have any questions regarding this matter, please contact me at your earliest convenience. If there are any additional regulations for the mixed radioactive/hazardous wastes, please contact me as soon as possible. Your prompt attention to this matter is deeply appreciated.

Very truly yours,

Scott A. Nesbit Staff Engineer

SAN:mag/0033g

cc: Ms. Andrea Dakoski, OEPA

Mr. Paul Vandermeer, OEPA Mr. James Magella, General Electric, Ravenna Lamp

Mr. James Hannan, DLA

EXHIBIT C

WASTEWATER DISPOSAL

Form Approved. OMB No. 2950-0039. Expires 9-30-91

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		WASTE MANIFEST	OHIDO	5 9 0 6 1 3 3	<u> 7 6 1 </u>	2 5 3	of 1	1		Federal law.		
	3.	Generator's Name and Mailing Address					A. State Manifest Document Number					
		GENERAL ELECTRIC - RAVEN										
	Cood II. Chestrot of Charles of Chestral							B. State Generator's ID				
		Generator's Phone (216) 297-0	1861 1000 a a ma	The HEEDA	ID Number		C. State Tr	ansmodere	ID 0/1	5225		
	5.	Transporter 1 Company Name OWNChemical Waste	nanagema	I D D 9 9		61811				166-591		
	7	Transporter 2 Company Name			ID Number	01012	E. State Tr			100 OP1		
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	9.	Designated Facility Name and Site Addre	ess	10. US EPA	ID Number		G. State F					
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		20. Facility Owner or Operator: Certificat	ion of receipt of	hazardous materials	covered by	this man	ifest except	as noted in	Item 19			
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Corporate Environmental Programs General Electric Company 3135 Easton Turngike, Fairfield, CT 06431

Letter From Chief Financial Officer

March 23, 1995

Administrator U.S. EPA Region V 230 South Dearborn Chicago, IL 60604

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, NY 12345. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage "and closure and/or post-closure care" as specified in subpart H of 40 CFR parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for "both sudden and nonsudden" accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265:----SEE SCHEDULE A

- 1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimate covered by the test are shown for each facility: ---- SEE SCHEDULE B
- 2. The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: --- SEE SCHEDULE B

- 3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H or 40 CFR parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: ---- SEE SCHEDULE C
- 4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: --- NONE
- 5. This firm is the owner or operator or guarantor of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144 and is assured through a financial test. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:—— NONE

This firm "is required" to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on *December 31st*. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended *December 31, 1994*.

Part B. Closure or Post-Closure Care and Liability Coverage

Alternative II

(Dollars in thousands)

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)

\$55,287

2. Amount of annual aggregate liability coverage to be demonstrated

\$39,000

3. Sum of lines 1 and 2

\$94,287

Page Three TSDF

4. Current bond rating of most recent issuance and name of rating service	Aaa- Moody's AAA - Standard & Poors
5. Date of issuance of bond	9/15/92
6. Date of maturity of bond	9/15/95
*7. Tangible net worth (if any portion of the closure or post- closure cost estimates is included in "total liabilities"on your financial statements you may add that portion to this line)	\$15,014,000
*8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$152,151,000
9. Is line 7 at least \$10 million? (Yes/No)	YES
10. Is line 7 at least 6 times line 3? (Yes/No)	YES
*11. Are at least 90% of assets located in the U.S.? (Yes/No) If not, complete line 12.	NO
12. Is line 8 at least 6 times line 3? (Yes/No)	YES

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Page Four TSDF

Dennis D. Dammerman

Senior Vice President - Finance March 23, 1995

EXPLANATIONS - ESTIMATES "CHANGED" FROM LAST YEAR (i.e., not adjusted according to the inflation factor)

FISCAL YEAR ENDED DECEMBER 31, 1994

EPA #ID	EXPLANATION
CAD009542721	PERMIT BY RULE - \$1M SUDDEN LIABILITY; TSDF CERTIFIED CLOSED - 10/17/94 CA LTR
CAD981375124	INCREASED HAZARDOUS WASTE DISPOSAL COSTS + 20% SAFETY FACTOR; \$1M SUDDEN LIA.
IAD075836130	DROPPED PER 3/15/94 RELEASE FROM EPA REGION VII
1LD079135133	INCREASED CLOSING
NCD050409150	INCREASED TO REFLECT HIGHER DISPOSAL COSTS FOR RESIDUAL MATERIAL
NYD066832023	INCREASED AMENDED CLOSURE PLAN; \$9M NONSUDDEN LIABILITY
NYD002080034	INCREASED AMENDED CLOSURE PLAN; \$9M NONSUDDEN LIABILITY
NYD002084135	DROPPED PER 6/27/94 RELEASE FROM NY
OHD074713561	DROPPED PER 3/25/93 RELEASE FROM OHIO
OHD009101494	DROPPED PER 1/25/95 RELEASE FROM OHIO
OHD000817304	DROPPED PER 1/25/95 RELEASE FROM OHIO
ОНО004302428	DECREASED -STORAGE BLG CERT. CLOSED PER 10/18/93 ONIO LTR. 1994 FILED NEW PLAN.
OHD004227369	DROPPED PER 2/23/95 RELEASE FROM OHIO
OHD000721456	DROPPED PER 4/14/94 RELEASE FROM OHIO
ОНО 004176046	DROPPED PER 1/25/95 RELEASE FROM OHIO
оноо59061317	DROPPED PER 4/2/93 RELEASE FROM OHIO
OHD004226171	DROPPED PER 5/21/93 RELEASE FROM OHIO
PRD090383860	DROPPED PER 3/14/94 RELEASE FROM PR ENV. QUALITY BOARD
PRD090070459	DROPPED PER 3/14/94 RELEASE FROM PR ENV. QUALITY BOARD
PRD090282757	STORAGE AREA CLOSED AND PENDING DECLASSIFICATION
SCD049126907	SURFACE IMPOUNDMENT CERTIFIED CLOSED PER 3/11/94 LETTER FROM SC DHEC
TXD060718269	LIABILITY ONLY. CLOSURE - SEE TSCA PCB COMMERCIAL STORER SCHEDULE A
VAD980551782	REDUCED DRUM STORAGE AREA CERTIFIED CLOSED PER 9/22/94 LETTER FROM VA
WVD088911854	REDUCED DIMER TANK CERTIFIED CLOSED PER 1/6/95 LETTER FROM WEST VIRGINIA
TOTAL - 24	

TOTAL: 24

SCHEDULE A - LIABILITY FISCAL YEAR ENDED DECEMBER 31, 1994 (re: Subpart H of 40 CFR Parts 254 and 265)

03-26-1995 PAGE: 1

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
ALD981026677	GE PLASTICS	1 PLASTICS DR.	BURKVILLE	AL	36752
CAD030584502	GE INDUSTRIAL & POWER SYSSERVICE	3601 E. LaPALMA AVE.	ANAHEIM	CA	92806
CAT000611095	GE ELECTRICAL DISTR. & CONTROLS	11115 VAN OWEN ST.	NORTH HOLLYWOOD	CA	91605
CAD009208075	GE INDUSTRIAL & POWER SYSSERVICE	5441 E. 14TH ST.	OAKLAND	CA	94601
CAD009542721	GEAE (PERMIT BY RULE)	1923 E. AVION ST.	ONTARIO	CA	91761
CAD981375124	GEAE (PERMIT BY RULE)	2264 EAST AVION PLACE	ONTARIO	CA	91761
CAD001818541	GE PLASTICS (PERMIT BY RULE)	301 WOOLEY RD.	OXNARD	CA	93030
CAD053914206	GE INDUSTRIAL & POWER SYSNUCLEAR	P.O. 460	PLEASONTON	CA	94566
CTD001453711	GE	1285 BOSTON AVE.	BRIDGEPORT	CT	06601
CTD000842492	GE ELECTRICAL DISTR. & CONTROLS	41 WOODFORD AVE.	PLAINVILLE	CT	06062
GAD003308145	GE ELECTRIC DISTR. & CONTROLS	1935 REDMOND CIRC.	ROME	GA	30161
IAD005272703	GE ELECTRICAL DISTR. & CONTROLS	510 AGENCY RD.	W. BURLINGTON	IA	52655
1AD000678037	GE BURLINGTON BASKET COMPANY-PDC	1404-1418 W. PLEASANT ST.	W. BURLINGTON	IA	52655
110070015714	GE INDUSTRIAL & POWER SYSSERVICE	6045 C NOTTINGHAM	CHICAGO	TI	60638
ILD005443866		1501 S. 19TH ST.	MATTOON		61938
ILD005473888		709 W. WALL ST.	MORRISON		61270
	GE CHEMICALS, INC.	CANAL RD.	OTTAWA		61350
IND004557815	GE ELECTRICAL DISTR. & CONTROLS	1701 COLLEGE ST.	FORT WAYNE	TM	46802
IND004937019		12TH ST., SE., P.O. 657	LINTON		47441
IND006376362		LEXAN LN.	MT. VERNON		47620
KSD041917501	GE AIRCRAFT ENGINES	STROTHER FIELD	ARKANSAS CITY	KS	67005
KADUUUAA	GE KENTUCKY GLASS	903 RUSSELL CAVE PIKE	LEXINGTON	KY	40505
	GE APPLIANCES	APPLIANCE PK. 65-100	LOUISVILLE		40225
	GE AIRCRAFT ENGINES	US. HWY. 41A, RTE. 2	MADISONVILLE		42431
MDD046279311	GE APPLIANCES	9001 SNOWDEN RIVER PKWY.	COLUMBIA	МО	21046
MTD050676622	GE INDUSTRIAL & POWER SYSSERVICE	18075 KRAUSE ST.	RIVERVIEW	MI	48192

SCHEDULE A - LIABILITY FISCAL YEAR ENDED DECEMBER 31, 1994 (re: Subpart H of 40 CFR Parts 254 and 265)

03-26-1995 PAGE: 2

	EPA 10#	FACILITY	STREET	CITY	\$T	ZIP
			1223 FAIRGROVE CHURCH RD.	HICKORY		28601
	NCD050409150	GE INDUSTRIAL & POWER SYSNUCLEAR		WILNINGTON		28402
	NYD093256063	GE ELECTRICAL DIST. & CONTROLS	381 BROADWAY	FORT EDWARD	NY	12828
	NYD071094197	GE CORPORATE RESEARCH & DEVELOPMENT	P.O. 8 (BLDG. K-1, RM. 1A69)	SCHENECTADY	NY	12301
	NYD066832023	GE PLASTICS	NORYL AVE.	SELKIRK	NY	12158
	NYD067539940	GE INDUSTRIAL & POWER SYSSERVICE	175 MILENS RD.	TONAWANDA	NY	14150
	NYD002080034	GE PLASTICS	260 HUDSON RIVER RD.	WATERFORD	NY	12188
	OHD000817312	GE AIRCRAFT ENGINES	1 NEUMANN WAY (M/D N123)	CINCINNATI	ΛH	45215
	OHD048432975		1133 E. 152ND ST.	CLEVELAND		44110
	OHD004302428		1350 S. SECOND ST.	COSHOCTON		43812
	OHD048111090	·	85 W. ASTUBULA	JEFFERSON		44047
	OHD004224960		1313 W. MARKET ST.	WARREN		44485
	PAD060682622	GE LIGHTING	MAYER ST.	BRIDGEVILLE	PA	15017
	PAD005033055	GE TRANSPORTATION SYSTEMS	2901 E. LAKE RD., BLDG. 13-2	ERIE	PA	16531
	PAD059290908	GE TRANSPORTATION SYSTEMS	INDUSTRIAL DR.	GROVE CITY	PA	16127
	PAD003026903	GE PROPERTY	NEW HOLLAND AVE.	LANCASTER	PA	17604
	SCD067002147	GE MEDICAL SYSTEMS	3001 W. RADIO DR.	FLORENCE	SC	29501
	SCD049126907	GE INDUSTRIAL & POWER SYSTEMS	300 GARLINGTON RD.	GREENVILLE	sc	29607
	TXD064114242	GE INDUSTRIAL & POWER SYSSERVICE	3202 MANOR WAY	DALLAS	TX	75235
	TXD060718269	GE INDUSTRIAL & POWER SYSSERVICE	8800 WALLISVILLE RD.	HOUSTON	TX	77029
	VAD070360219	GE LIGHTING	RTE. 3, P.O. 310	WINCHESTER	VA	22601
	VTD001075894	GE AIRCRAFT ENGINES	16 WINDCREST RD.	N. CLARENDON	VT	05759
	WAD009278706	GE AIRCRAFT ENGINES	220 S. DAWSON ST.	SEATTLE	WA	98108
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		GE MEDICAL SYSTEMS		MILWAUKEE		53219
		GE APPLIANCES	3114 N. GRANDVIEW BLVD.	WAUKESHA		53188
200	#10001E134f	GE VELFTUNES	2205 S. 43RD ST.	WEST MILWAUKEE	MI	33E 14
	WVD980552384	GE PLASTICS	1000 DUPONT RD., BLDG. 816	MORGANTOWN	w	26505
	WVD088911854	GE PLASTICS	STATE RTE. 892, P.O. 68	WASHINGTON	WV	26181
		•				

SCHEDULE A - LIABILITY FISCAL YEAR ENDED DECEMBER 31, 1994 (re: Subpart H of 40 CFR Parts 254 and 265)

03-26-1995 PAGE: 3

EPA ID#

FACILITY

STREET

CITY

ZIF

PAD060682622 GE LIGHTING - CORRECTIVE ACTION

BRIDGEVILLE, PA 15017

EPA REGION 3

YY

LETTER FROM CHIEF FINANCIAL OFFICER

8PM 1265

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Director Illinois Environmental Protection Agency 2200 Churchill Road P.O. Box 19276	March 23, 1995
Springfield, Illinois 62794-9276	
Dear Sir or Madam:	201404111/
I am the chief financial officer of	COMPANY, 1 River Rd., Schenectady, NY 12345
•	(1)
This letter is in support of the use of the financial test	
coverage and closure and/or post closure care	as specified in Subpart H of 35 Ill. Adm. Code Parts
724 and 725.	:
The firm identified above is the owner or operator of the both sudden and nonsudden	following facilities for which liability coverageaccidental occurrences is being demonstrated through
the financial test specified in Subpart H of 35 III. Adm.	Code 724 and 725.
Please attach a separate page if more space is needed for USEPA I.D. No. $\underline{ILD070015714}$	all facilities.
GE Industrial Power Systems	
Address 6045 S. Nottingham	
city Chicago, IL 60638	Continued on Schedule I
(7)	and the second of the second o
The firm identified above guarantees, through the guarante	
and 725, liability coverage for(8)	accidental occurences at the
following facilities owned or operated by the following:	NONE
USEPA I.D. No	
(5)	
Address	
. (6)	·
City	
USEPA I.D. No.	
(4)	
Name	
(5)	
Address	
City	
(7)	

The Agency is authorized to require, pursuant to litinois Revised Statutes 1983. Chapter 111 1/2, Paragraphs 1021(d) and 1021.1, that this information be submitted to the Agency by any person conducting a waste dispidal operation. Failure to provide this information for faisif Sation of this information may result in a civil penalty not to exceed \$10,000 and an additional civil penalty not to exceed \$1,000 per day of violation, and a fire not to exceed \$1,000 and imprisonment up to one year. This form has been approved by the forms Management Center

(Please attach a separate page if more space is neede	ed.)		
USEPA I.D. NoALD981026677	Closure Amount	Past Closure Amount	Closure and Post Closure —Amount
GE PLASTICS			
1 Plastics Dr.	\$62,354	. 0	\$62,354
city Burkville, AL		(* ())	•
(1)			
JSEPA I.D. No. CAD030584502	Closure Amount	Post Closure Amount	Closure and Post Closure <u>Amount</u>
GE INDUSTRIAL POWER SYSTEMS		. <u>.</u>	
3601 E. LaPalma Ave.			<u>.</u>
Anaheim, CA	\$73,314	0.	\$73,314
(7)			*
The firm identified above owns or operates the follow financial assurances for closure or, if a disposa) fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not co	ing hazardous wast cility, post closu any other financia r substantially ec	ire care, is not demoi il assurance mechanisi uivalent state mechai	istrated either t ms specified in isms. The
The firm identified above owns or operates the follow financial assurances for closure or, if a disposa) fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina	e management facilit ure care, is not demo ul assurance mechanism uivalent state mecha	istrated either t ms specified in isms. The
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina	e management facilit ure care, is not demo ul assurance mechanism uivalent state mecha	istrated either t ms specified in isms. The
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not cofacility: NONE (Please attach a separate page if more space is neede	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.)	e management facilit ure care, is not demo- il assurance mechanism urvalent state mecha- incial assurance are Post Closure	nstrated either t ms specified in nisms. The shown for each Closure and Post Closure
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.)	e management facilit ure care, is not demo- il assurance mechanism urvalent state mecha- incial assurance are Post Closure	nstrated either t ms specified in nisms. The shown for each Closure and Post Closure
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (**) Address (**)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.)	e management facilit ure care, is not demo- il assurance mechanism urvalent state mecha- incial assurance are Post Closure	nstrated either t ms specified in nisms. The shown for each Closure and Post Closure
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (**) Address (**)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.)	e management facilit ure care, is not demo- il assurance mechanism quivalent state mecha- incial assurance are Post Closure Amount	nstrated either t ms specified in nisms. The shown for each Closure and Post Closure
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (1) Address (2) (3) (4)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.)	e management facilit ure care, is not demo- il assurance mechanism quivalent state mecha- incial assurance are Post Closure Amount	nstrated either t ms specified in nisms. The shown for each Closure and Post Closure
The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (1) (2) (3) (4) (5) (4)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.) Closure Amount	Post Closure Post Closure Post Closure	closure and Post Closure
4. The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not co facility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (4) Name (5) OSEPA I.D. No. (4) USEPA I.D. No. (4)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.) Closure Amount	Post Closure Post Closure Post Closure	closure and Post Closure
4. The firm identified above owns or operates the follow financial assurances for closure or, if a disposal fa IEPA, USEPA or a State through the financial test or Subpart H of 40 CFR Parts 264 and 265 or equivalent o current closure or post closure cost estimates not confacility: NONE (Please attach a separate page if more space is neede USEPA I.D. No. (1) Wame (5) Address (6) USEPA I.D. No. (1)	ing hazardous wast cility, post closu any other financia r substantially ec vered by such fina d.) Closure Amount	Post Closure Post Closure Post Closure	closure and Post Closure

3. In states where IEPA is not administering the financial requirements of Subpart H of 40 CFR Parts 254 and 265, this firm is demonstrating financial assurance for the closure or post closure care of the following

PART B. Closure or Post-Closure Care and Liability Coverage

AV:ts/1029k/27-29

(Dollars in Thousands)

	AZTERNATIVE II		
1.	Sum of current closure and post-closure cost estimates	55,28	7
2.	Amount of annual aggregate liability coverage to be demonstrated	39,00	0
		94,28	7
3.	Sum of lines 1 and 2	Aaa-Mo	ody's
4.	Current bond rating of most recent issuance and name of rating service	9/15/	
S.	Date of issuance of bond	9/15/	
6.	Date of maturity of bond	>	
*7.	Tangible net worth	15,014	,000
8.	Total assets in the U.S	\$ 152,15	1,000
-		YES	NO
	Is line 7 at least \$10 million?	X	
9.	Annual Control of the	X	-
10.	Is line 7 at least 6 times line 3?		
*11.	Are at least 90% of assets located in the U.S.? If not complete line 12		<u> </u>
12.	Is line 8 at least 6 times line 3?	Х	
I her 724.2 Signa	(1. Amod , a Ammonana	lł. Adm. (Code
Name	DENNIS D. DAMMERMAN		
Title	Senior Vice President - Finance		
Date	March 23, 1995 17	•	
	(18)		•

EXPLANATIONS - ESTIMATES "CHANGED" FROM LAST YEAR (i.e., not adjusted according to the inflation factor)

FISCAL YEAR ENDED DECEMBER 31, 1994

EPA #ID	EXPLANATION
CAD009542721	PERMIT BY RULE - SIM SUDDEM LIABILITY; TSDF CERTIFIED CLOSED - 10/17/94 CA LTR
	INCREASED HAZARDOUS WASTE DISPOSAL COSTS + 20% SAFETY FACTOR; \$1M SUDDEN LIA.
	DROPPED PER 3/15/94 RELEASE FROM EPA REGION VII
IL0079135133	INCREASED CLOSING
NCD050409150	INCREASED TO REFLECT HIGHER DISPOSAL COSTS FOR RESIDUAL MATERIAL
	INCREASED AMENDED CLOSURE PLAN; \$94 NONSUDDEN LIABILITY
NYD002080034	INCREASED AMENDED CLOSURE PLAN; \$9M NOWSUDDEN LIABILITY
NYD002084135	DROPPED PER 6/27/94 RELEASE FROM NY
оно074713561	DROPPED PER 3/25/93 RELEASE FROM OHIO
OHD009101494	DROPPED PER 1/25/95 RELEASE FROM OHIO
OHD000817304	DROPPED PER 1/25/95 RELEASE FROM OHIO
OHD004302428	DECREASED -STORAGE BLG CERT. CLOSED PER 10/18/93 OHIO LTR. 1994 FILED NEW PLAN.
OHD00422 73 69	
DHD000721456	DROPPED PER 4/14/94 RELEASE FROM OHIO
OHD004176046	DROPPED PER 1/25/95 RELEASE FROM OHIO
OHD059061317	DROPPED PER 4/2/93 RELEASE FROM OHIO
CHD004226171	DROPPED PER 5/21/93 RELEASE FROM OHIO
PRD090383860	DROPPED PER 3/14/94 RELEASE FROM PR ENV. QUALITY BOARD
PRD090070459	DROPPED PER 3/14/94 RELEASE FROM PR ENV. QUALITY BOARD
PRD090282757	STORAGE AREA CLOSED AND PENDING DECLASSIFICATION
\$0049126907	SURFACE IMPOLATOMENT CERTIFIED CLOSED PER 3/11/94 LETTER FROM SC DHEC
	LIABILITY ONLY. CLOSURE - SEE TSCA PCB COMMERCIAL STORER SCHEDULE A
	REDUCED DRUM STORAGE AREA CERTIFIED CLOSED PER 9/22/94 LETTER FROM VA
	REDUCED DIMER TANK CERTIFIED CLOSED PER 1/6/95 LETTER FROM WEST VIRGINIA
TOTAL: 24	

OWER/OPERATED FACILITIES (ILLINOIS) SCHEDULE I - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1994

	EPA ID#	FACILITY	AT 6# AT				
			STREET	CITY	ST	ZIP	
	***************************************	: 其都是在李宗宗也也就是我想到这些我也就是我也是我是不是不是不是他的人。		ZZZZZZZZZZZZZZZZZZ			
9587 ²	- DD070015714	"GE" TADUSTRIAL" & POWER SYST-SERVICE"	- 6045 5. KONIKUKAR	- 64-6-6			*
	110005443866	GE LIGHTING	1501 S. 19TH ST.		-7t-	**************************************	
	ILD005272992	GF MATARS	*	MATTOON	IL	61938	
	*		709 W. WALL ST.	HORRISON	16	61270	
		GE CHEMICALS, INC.	CANAL RD.	OTTAWA	11	61350	
	TOTAL FACILIT	IES: 4	· ·		4 1-	0,550	

^{*}Typed on form

(ILLINOIS) SCHEDULE II. (ITEM #1) - CLOSURE/POST CLOSURE IN ILLINOIS FISCAL YEAR ENDED DECEMBER 31, 1994

EPA 10 #	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	70741	
	《共国帝的世界中国社会中国社会中国社会中国社会中国社会中国社会中国社会中国社会中国社会中国社会	医自然性 人名西班里 医阿里斯氏 医阿里斯氏 医阿里斯氏 医阿里斯氏 医阿里斯氏 医阿里斯氏 医阿里斯氏 医阿里斯氏 医克里斯氏 医皮肤 医克里斯氏 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤	*************************************	er e				
- ILDO/0015714-	GET INDUSTRIAL & POMER SYS. SER	-6045 S. NOTH #6###	- Chicago	-dt			132-704	*
ILD005272992	GE LIGHTING	709 W. WALL ST.					26,8 06	÷
ILD079135133	GE CHEMICALS, INC.	CANAL RD.	MORRISON Ottawa	ĮŁ IL	255,200 325,880	0	255,200	
			OT FRAME		727,000	V	325,880	
	TOTAL: 4		TOTAL:		740,590	. 0	740.590	

^{*}Typed on form

(ILLINOIS) SCHEDULE III (ITEM #3) - CLOSURE/POST CLOSURE WHERE IEPA IS NOT ADMINISTERING FISCAL YEAR ENDED DECEMBER 31, 1994

EPA ID #	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
			**************************************	# \$ # E	:2233333322 <u>5</u> 2	22222422525	
~ AE098102 <i>6</i> 677	TEE PLASTICS	- iplastics or		- AL-	62.35 4-		62,354
	TOTAL: 1		TOTAL:		62,354	0	62,354
	" GE TROUSTRIAL %-POWER' 575: "SER"	- 《於序序》					,
CAT000611095			TRAKETH				73 ,314
CAD009208075			NORTH HOLLYW		60,256	0	60,256
CAD009542721		1923 E. AVION ST.	CAKLAND	CA	36,153	0	36,153
CAD981375124			ONTARIO	CA	90,000	0	90,000
CAD001818541	• • • • • • • • • • • • • • • • • • • •	2264 EAST AVION PLACE	CNTARIO	CA	35,000	0	35,000
	GE INDUSTRIAL & POWER SYS NUC		OXNARD	CA	53,729	0	53,729
CADU339 14200	GE TADUSTRIAL & PUMER STSNUC	P.O. 460	PLEASONTON	CA	178,393	9,660	188,053
	TOTAL: 7		TOTAL:		526,845	9,660	536,505
CTD001453711	CE	SART BARROW ALM					
		1285 BOSTON AVE.	BRIDGEPORT	CT	889,147	710,844	1,599,991
C1D000842472	GE ELECTRICAL DISTR. & CONTROL	41 WOODFORD AVE.	PLAINVILLE	CT	661,507	1,697,269	2,358,776
	TOTAL: 2		TOTAL:		1,550,654	2,408,113	3,958,767
GAD003308145	GE ELECTRIC DISTR. & CONTROLS	1935 REDMOND CIRC.	ROME		274 6/6		
		TOP REPORTS OFFICE	RUME	GA	271,548	0	271,548
	TOTAL: 1		TOTAL:		271,548	0	271,548
I &D 0.05272703	GE ELECTRICAL DISTR. & CONTROL	E40 appuny pa					
		· · · · · · · · · · · · · · · · · · ·	W. BURLINGTO	IA	497,183	24,861	522,044
180000018031	GE BURLINGTON BASKET COMPANY-P	1404-1418 W. PLEASANT ST.	W. BURLINGTO	IA	209,476	961,378	1,170,854
	TOTAL: 2		TOTAL:		706,659	986,239	1,692,898

	GE ELECTRICAL DISTR. & CONTROL		FORT WAYNE	[N	54,233	0	54,233
IND006040299		12TH ST., SE., P.O. 657	LINTON	ΙM	63,077	0	63,077
IND006376362	GE PLASTICS	LEXAN LN.	MT. VERNON	IN	1,987,664	0	1,987,664
	TOTAL: 3		TOTAL:		2,104,974	0	2,104,974
KSD041917501	GE AIRCRAFT ENGINES	STROTHER FIELD	ADVANCAS PIT	ve.	72 022	•	12
		CONTINUE LABOR	ARKANSAS CIT	A.S	32,822	0	32,822
	TOTAL: 1		TOTAL:		32,822	0	32,822
207870AGG	GE KENTUCKY GLASS	OUS Bliccell Lane pine	I EATHORN	Ma.	170 040		
	GE APPLIANCES	903 RUSSELL CAVE PIKE	LEXINGTON	KY	130,918	0	130,918
		APPLIANCE PK. 65-100	LOUISVILLE	KY	0	0	0
KTUU/404/338	GE AIRCRAFT ENGINES	US. HWY. 41A, RTE. 2	MADISONVILLE	KY	224,393		224,393

^{*}Typed on form

(ILLINOIS) SCHEDULE III (ITEM #3) - CLOSURE/POST CLOSURE WHERE IEPA IS NOT ADMINISTERING FISCAL YEAR ENDED DECEMBER 31, 1994

EPA ID #	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	
=======================================	·	, <u> </u>		z = I z		*********	
•	TOTAL: 1		TOTAL:		32,822	0	32,822
KYD006938395	GE KENTUCKY GLASS	903 RUSSELL CAVE PIKE	LEXINGTON	ΚY	130,918	0	130,918
KYD006387021	GE APPLIANCES	APPLIANCE PK. 65-100	LOUISVILLE	KY	0	0	. 0
KYD074047556	GE AIRCRAFT EHGINES	US. HWY. 41A, RTE. 2	MADISONVILLE	ΚY	224,393	0	224,393
							-
	TOTAL: 3		TOTAL:		355,311	0	355,311
NCD003237948	GE ELECTRICAL DISTR. & CONTROL	1223 FAIRGROVE CHURCH RD	HICKORY	NC	38,753	6,068,120	6,106,873
NCD050409150			WILMINGTON	NC	292,210	0,000,120	292,210
-					•		-
	TOTAL: 2		TOTAL:			6,068,120	
NYD093256063	GE ELECTRICAL DIST. & CONTROLS	381 BROADWAY	FORT EDWARD	HΥ	610,168	. 0	610,168
NYD071094197	GE CORPORATE RESEARCH & DEVELO	P.O. 8 (BLDG. K-1, RM. 1A69)	SCHENECTADY	ΚY	784,941	0	784,941
NYD066832023	GE PLASTICS	NORYL AVE.	SELKIRK	NY		239, 193	
NYD067539940	GE INDUSTRIAL & POWER SYSSER	175 MILENS RD.	TONAWANDA	NY	366,941	0	366,941
NYD002080034	GE PLASTICS	260 HUDSON RIVER RD.	WATERFORD	NY	11,713,940		11,801,777
						*******	********
	TOTAL: 5		TOTAL:		15,765,776	327,030	16,092,806
эноооо817312	GE AIRCRAFT ENGINES	1 NEUMANN WAY (M/D N123)	CINCINNATI	OH	434,393	0	434,393
OHD048432975	GE LIGHTING	1133 E. 152ND ST.	CLEVELAND	QН	466,335	0	466,335
OHD004302428	GE PLASTICS	1350 S. SECOND ST.	COSHOCTON	ОН	149,466	0	149,466
OHD048111090	GE LIGHTING	85 W. ASTUBULA	JEFFERSON	OH	816,640	C	816,640
OHD004224960	GE LIGHTING	1313 W. MARKET ST.	WARREN	OH	32,435	o	32,435
- 30mm, 10mm, 4							******
	TOTAL: 5		TOTAL:		1,899,269	. 0	1,899,269
SCD067002147	GE MEDICAL SYSTEMS	3001 W. RADIO DR.	FLORENCE	SC	168,611	1,435,291	1,603,902
SCD049126907	GE INDUSTRIAL & POWER SYSTEMS	300 GARLINGTON RD.	GREENVILLE	SÇ	0	6,299,150	6,299,150
							========
	TOTAL: 2	•	TOTAL:		168,611	7,734,441	7,903,052
TXD064114242	GE INDUSTRIAL & POWER SYSSER	3202 MANOR WAY	DALLAS	TX	12,430	0	12,430
							=======================================
•	TOTAL: 1		TOTAL:		12,430	0	12,430
VAD070360219	GE LIGHTING	RTE. 3, P.O. 310	WINCHESTER	VA	70,617	0	70,617
						********	*********
	TOTAL: 1		TOTAL:		70,617	. 0	70,617

(ILLINOIS) SCHEDULE III (ITEM #3) - CLOSURE/POST CLOSURE WHERE IEPA IS NOT ADMINISTERING FISCAL YEAR ENDED DECEMBER 31, 1994

EPA ID #	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	TOTAL
v10001075894	GE AIRCRAFT ENGINES	16 WINDCREST RD.	N. CLARENDON		0	993,978	
	TOTAL: 1		****				222222 22
	,		TOTAL:		0	993,978	993,978
WAD009278706	GE AIRCRAFT ENGINES	220 S. DAWSON ST.	SEATTLE	₩ A	41,942	0	
	TOTAL: 1		TOTAL:		41,942	0	41,942
⊮VD980552384	GE PLASTICS	1000 DUPONT RD., BLDG. 816	HODALITA II.				
WD088911854		STATE RTE. 892, P.O. 68	MORGANTOWN WASHINGTON	W	179,827	0	.,,,,,,,
	•		MASH ING I CR	w	443,272	0	443,272
	TOTAL: 2		TOTAL:		623,099	0	623,099
PAD060682622	GE LIGHTING - CORRECTIVE ACTIO	BRIDGEVILLE, PA 15017	EPA REGION 3	ХХ		. 0	3,572,000
	TOTAL: 1		TOTAL:		3,572,000	0	3,572,000
4 SD000742668	GESHAN	PORT BIENVILLE IND. PK.	BAY ST. LOUI	MG	325,462		775
			-A. 5,1 2001	n.g	-	0	325,462
	TOTAL: 1		TOTAL:		325,462	0	325,462
PRD090282757	GE LIGHTING	CARRION MARKIN LINE TANKS					
PRD090510793	GE ELECTRICAL DISTR. & CONTROL	CARRION NADHUD URG FINAL; POB P.O. 377		PR	50,000	0	50,000
PRD090492109	GE ELECTRICAL DISTR. & CONTROL	STATE RD. #3 KM 122.9		PR PR	994,364	0	994,364
PRD091019224	GE ELECTRICAL DISTR. & CONTROL	EL "RETIRO" INDUSTRIAL PK.		PR	2,232,341 48,385	0	2,232,341
PRD000692582	GE INDUSTRIAL & POWER SYS.	P.O. 187		PR	579,369	0	48,385 579,369
						=	22222222
	TOTAL: 5		TOTAL:		3,904,459	0	3,904,459
TXD061382206	GE RAILCAR REPAIR SERVICES COR	P.O. 115, TIFFON RD.	RANGER	TX	0	1,450,110	1,450,110
					========	=========	
	TOTAL: 1		TOTAL:		0	1,450,110	1,450,113
VAD980551782	GE FANUC AUTOMATION N. AMERICA	RTE. 29 N. AT RTE. 606	CHARLOTTESVI	VA	165,370	76,560	
	TOTAL: 1		TOTAL:		165,370	76,560	241,933
	CONTINGENCY RESERVE		CORPORATE	ΚΧ	2,000,000	0	2,000,000
			21-24 E		E2222222	•	2,000,000
	TOTAL: 1		TOTAL:		2,000,000	0	2,000,360
	TOTAL ALL FACILITIES: 54	SUM OF ALL C	PC ESTIMATES:		35,231, <i>7</i> 55		



2 January, 1992

Discharge Production Department Ravenna Lamp Plant General Electric Company 6800 N. Chestnut St., Ravenna, OH 442 216 297-0861

BECEIVED

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Ohio Environmental Protection Agency Division of Hazardous Waste Management Data Management Section Columbus, Ohio

Attn: Tom Crepeau

Re: Amended Closure Cost (General Electric OHD 059 061 317)

The following is a cost estimate for the Amended Closure Plan submitted June 25,1990. This information is in response to your request (Item 1) from the approval letter dated December 11,1991. See attachment.

I trust the information provided will meet the requirements of your request, and should there be any questions or needs for additional information, please contact me at (216) 297-0861.

Jim Magella EHS Specialist

cc: Edda Post

Don Grube

Paul Vandermeer

Lisa Pierard

Murat Tukel

RAVENNA LAMP PLANT

GENERAL ELECTRIC OHD 059 061 317

CLOSURE COST

Remove contaminated soil and pipe; replace soil; collect water in drums		20,000
Soil disposal	25 tons @\$200	5,000
Water samples (trichloroethylene, acetone, methanol, alcohol, ignitibility)	4 @\$300	1,200
Soil samples (acetone,ignitibility,methanol, trichloroethylene,methylene chloride, n-butyl acetate)	6 @\$600	3,600
Sampling/Monitorong	20hrs @\$60	1,200
Reporting		500
Certification		1,200
	Subtotal	\$32,700
ADDITIONAL COST (Item 2)		
Concrete removal and soil excavation (pad,manholes)		30,000
Soil samples		3,000
Sampling/Monitioring		1,440
	Subtotal	\$34,440

Project total

\$67,140



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 417-777-0200

Telephone: 412-772-0200 Fax: 412-772-1955

June 13, 1990



Ohio Environmental Protection Agency Division of Solid and Hazardous Waste Management 1800 Watermark Drive PO BOX 1049 Columbus, Ohio 43266-0149

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

ATTENTION: Paul Vandermeer

CLOSURE PLAN MODIFICATION
GENERAL ELECTRIC - RAVENNA LAMP
OHD 059 061 317
KILLAM PROJECT NO. 2G018

Gentlemen:

The hazardous waste storage area at General Electric Company, Ravenna Lamp Plant was cleaned twice according to the approved closure plan. Samples of the floor rinseate were obtained for lab analysis with analytical results as shown in the attached table. As can be seen in the table, the rinseate from the first cleaning exceeded clean levels for both alcohol and trichloroethylene, whereas the second cleaning rinseate exceeded only for trichloroethylene.

Also included in the table are analysis results of a distilled water field blank and a sample of the city water being used for the rinse process. Both these samples were obtained during the second cleaning in May 1990. These two samples also contain concentrations of trichloroethylene.

Based on the low levels of trichloroethylene present (less than 0.005~mg/l) and the presence of trichloroethylene in the field blank and rinsing water samples, we request that the clean level be raised from analytical detection limit 0.00012 to 0.005~mg/l. This would allow the current levels to be considered clean and the closure complete.



June 13, 1990 Page Two

Regarding the drain line from the hazardous waste storage area, a revised plan is attached which describes our proposed course of action to finalize work with the soils. The revised plan is being submitted for your approval prior to proceeding with work.

Due to the difficulty described above in decontaminating the storage area to clean levels and the problems addressed in the attached revised plan, we hereby request an extension of the closure deadline to 180 days beyond the approval date of the attached revised plan.

If you have any questions, please contact me at your earliest convenience.

Very truly yours,

Rick A. Myers Senior Project Engineer

RAM:PRZ/4033D

cc: Ms. Andrea Dakoski - OEPA

Mr. James Magella - GE Mr. Donal Grube - GE

Ms. Lisa Pierard - OEPA

Attachment

OHT 55906/3/7



Corporate Environmental Programs General Electric Company 3135 Easton Turnpike, Fairfield, CT 06431 THE BINED

March 26, 1990

CFFICE OF RCRA WASTE MATRICE MINT DIVISION EPA, REGION V

Re: Demonstration by General Electric Company of Financial Responsibility for Liability Coverage and Closure and/or Post Closure Care

Dear Sir or Madam:

The attached information is being submitted by the General Electric Company to comply with the financial responsibility requirements relative to your Agency's hazardous waste regulations:

- o Letter from the Chief Financial Officer, with wording for the financial test, including:
 - -- Attachments listing affected facilities as specified in the Letter from the Chief Financial Officer
 - -- List of facilities whose closure and/or post-closure cost estimates differ from the inflation-adjusted estimates from last year, including facilities which no longer require financial assurance, and explanations for those discrepancies. Please note that we used an inflation factor of 4.8%, which was derived from the most recent Implicit Price Deflator for the GNP, available as of January 30, 1990. All estimates were rounded to the nearest thousand.
- O Copy of General Electric Company's 1989 Annual Report which includes the independent public accountant's report on examination of financial statements for the latest completed fiscal year.
- O Special report from KPMG Peat Marwick Certified Public Accountants with respect to General Electric Company's financial information included in the Letter from the Chief Financial Officer.
- O Copy of General Electric Company's 1989 Form 10-K to the Securities and Exchange Commission.

If you have any questions about the information submitted, please contact me at (203) 373-2950.

Patal Chin

Environmental Consultant

PC:lcm Enclosures

SCHEDULE A - LIABILITY

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
ALD981026677	GE PLASTICS-BURKVILLE OPERATION	ONE PLASTICS DRIVE	BURKVILLE	AL	36752
CAD030584502	GE LOS ANGELES SERVICE CENTER	3601 E. LaPALMA AVENUE	ANAHEIN	CA	92806
CAT000611095		11115 VAN OWEN STREET	NORTH HOLLYWOOD	CA	91605
	GE SAN FRANCISCO SERVICE CTR.	5441 E. 14TH STREET	OAKLAND	CA	94601
	GE EMC/ONTARIO	1923 E. AVION STREET	ONTARIO	CA	91761
CAD053914206	GE VALLERCITOS NUCLEAR CENTER	PO BOX 460	PLEASONTON	CA	94566
CTD001453711	-	1285 BOSTON AVENUE	BRIDGEPORT	CT	06601
CTD000842492	GE WASTEWATER SETTLING AREA	41 WOODFORD AVENUE	PLAINVILLE	CT	06062
FLD001690924	GE SIMULATED & CONTROL SYSTEMS DEPT	1800 VOLUSIA AVENUE	DAYTONA BEACH	FL	32015
GAD003308145	GE MEDIUM TRANSFORMER OPERATION	1935 REDMOND CIRCLE	ROME	GA	30161
IAD075836130	GE APPLIANCE CONTROL DEPARTMENT	1803 RADIANT ROAD	CARROLL	1.4	51401
IAD005272703	GE SWITCHGEAR OPERATIONS	510 AGENCY ROAD	W. BURLINGTON		52655
IAD000678037	GE BURLINGTON BASKET COMPANY	1404-1418 WEST PLEASANT ST.	W.BURLINGTON		52655
TLD005453691	GE GENERAL PURPOSE CONTROLS	1601 GE ROAD	BLOOMINGTON	71	61704
ILD070015714	GE SERVICE SHOP - CHICAGO	6045 SOUTH NOTTINGHAM	CHICAGO		60638
110980503023	GE	1540 S. 54TH AVENUE	CICERO		60650
1LD005443866	GE MATTON LAMP	1501 S. 19TH STREET	MATTON		61938
ILD062338694	GEIPS - MORRIS PLANT	7555 E. COLLINS ROAD	MORRIS		60450
1LD005272992	GE APPLIANCE CONTROLS	709 W. WALL STREET	MORRISON		61270
1ND000803726	GE BLOOMINGTON PLANT OPERATIONS	301 NORTH CURRY PIKE	BLOOMINGTON	T No	47402
	GE SPECIALTY TRANSFORMER OPERATION	1701 COLLEGE STREET			46802
	GE GENERAL PURPOSE MOTOR (AND GEA)		_		46802
		12TH ST. SE. P.O. BOX 657			47441
IND006376362	GE PLASTICS	LEXAN LANE			47620
KSD041917501	GE-AEMC	STROTHER FIELD	ARKANSAS CITY	KS	67005
KYD006387021	GE APPLIANCE PARK	APPLIANCE PARK 26-101	LOUISVILLE	۲Y	40225
		US HIGHWAY 41A ROUTE 2	MADISONVILLE		42431
.2053782413	GE NEW ORLEANS SERVICE CENTER	1115 DEARMAS STREET	NEW ORLEANS	L▲	70114

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SCHEDULE A - LIABILITY

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
MDD046279311	GE APPLIANCE PARK-EAST	9001 SNOWDEN RIVER PARKWAY	COLUMBIA		21046
MID050676622	GE DETROIT SERVICE CENTER	18075 KRAUSE STREET	RIVERVIEW	MI	48192
MND980501407	GE MINNEAPOLIS SERVICE CENTER	2025 49TH AVENUE NORTH	MINNEAPOLIS	MN	55430
MOD030709539	GE MOTORS - SPRINGFIELD	E.SUNSHINE	SPRINGFIELD	MO	65808
MOD006312375	GE ST. LOUIS LAMP	6251 ETZEL AVENUE	ST. LOUIS		63133
	GE HICKORY TRANSFORMER PLANT	1223 FAIRGROVE CHURCH ROAD	HICKORY	NC	28601
NCDU50409150	GE NUCLEAR FUEL & COMPONENT MFG.	CASTLE HAYNE RD. MC J26	WILMINGTON	NC	28402
NJD003918570	GE NEW YORK SERVICE CENTER	6001 TONNELLE AVENUE	NORTH BERGAN	NJ	07047
	GE CAPACITOR & POWER PROTECTION	381 UPPER BROADWAY	FORT EDWARD	NY	12828101
	GE CAPACITOR & POWER PROTECTION	JOHN STREET	HUDSON FALLS	NY	12839
NYD002084135		1 RIVER ROAD, BUILDING 41-111	SCHENECTADY	NY	12345
	GE CORPORATE RESEARCH & DEVELOPMENT	BLDG. K-1, ROOM 1A69	SCHENECTADY	NY	12301
	GE PLASTICS - SELKIRK OPERATIONS	NORYL AVENUE	SELKIRK	NY	12158
	GE ELECTRONICS PK, BG 7 CHEM ANNEX	ELECTRONICS PARK, BLG. 9, RM 102	SYRACUSE	NY	13221
	GE BUFFALO SERVICE CENTER	175 MILENS ROAD	TONAWANDA	NY	14150
	GE AEROSPACE ELECTRONIC SYSTEMS	FRENCH ROAD	UTICA	NY	13503
M10002080034	GE SILICONE PRODUCTS DIVISION	260 HUDSON RIVER ROAD	WATERFORD	NY	12188
	GE AIRCRAFT ENGINES - EVANDALE	1 NEUMANN WAY - MD N123	CINCINNATI	ОН	45215
OHD000817304		1350 TENNESSEE AVE.	CINCINNATI	ОН	45229
	GE CINCINNATI SERVICE CENTER	156 CIRCLE FREEWAY DRIVE	CINCINNATI	ОН	45246
OHD009101494	-	333 W. SEYMOUR AVENUE	CINCINNATI	OH	45216
	GE CHEMICAL PRODUCTS	1099 IVANHOE ROAD	CLEVELAND	ОН	44110
	GE EUCLID SPECIALTY	1133 E. 152ND STREET	CLEVELAND	ОН	44110
	GE COSHOCTON PLANT	1350 SOUTH SECOND STREET	COSHOCTON	ОН	43812
	GE LIGHTING - TUNGSTEN PRODUCTS	21800 TUNGSTEN ROAD	EUCLID	OH	44117
OHD000721456		3024 SYMMES RD.	HAMILTON	OH	45215
	JEFFERSON WELD PLANT	85 W. ASTUBULA	JEFFERSON	OH	44047
	GE NILES/MAHONING GLASS GE RAVENNA LAMP	403 N. MAIN STREET	NILES	OH	44446
	GE OHIO LAMP	6800 N. CHESTNUT STREET	RAVENNA	OH	44266
	GE TRUMBULL LAMP	1210 N. PARK AVENUE	WARREN	OH	44483
	GE YOUNGSTOWN LAMP	1313 W. MARKET STREET	WARREN	OH	44485
0110004220171	GE TOURGSTOWN LAMP	40 HUGHES STREET	YOUNGSTOWN	ОН	45027
~4D060682622	GE BRIDGEVILLE GLASS		BRIDGEVILLE	PA	15017
	GE - ERIE PLANT	2901 EAST LAKE ROAD, BLG 13-2	ERIE	PA	16531
	DIESEL ENGINE - GROVE CITY PLANT	INDUSTRIAL DRIVE	GROVE CITY	PA	16127
PAD003026903	GE PROPERTY	NEW HOLLAND AVENUE	LANCASTER	PA	17604

SCHEDULE A - LIABILITY

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
***********		*************************		=====	*#========
SCD067002147	GE MEDICAL SYSTEMS	3001 WEST RADIO DRIVE	Et ARELIAE		****
	TE TESTANE OF STERIO	SOOT WEST KADIO DRIVE	FLORENCE	S¢	29501
TXD064114242	GE DALLAS SERVICE CENTER	3202 MANOR WAY	DALŁAS	Ŧv	75.77
	GE HOUSTON SERVICE CENTER	8800 WALLISVILLE ROAD			75235
1,1000	DE MODELON DENVIOL DENVIEW	OOOO WALLISVILLE ROAD	HOUSTON	1 X	77029
VAD003132255	GE MOBILE COMMUNICATIONS	MAINTEN MAINTEN			
		MOUNTAIN VIEW ROAD	LYNCHBURG		24502
AND 1020021A	GE WINCHESTER LAMP	ROUTE 3, PO BOX 310	WINCHESTER	VA	22601
UF0000007/7/					
V10002083434	GE ARMAMENT SYSTEMS DEPARTMENT	LAKESIDE AVENUE	BURLINGTON	VT	05401
WAD009278706	GE GEAE SCMC/SEATTLE	220 SOUTH DAWSON STREET	SEATTLE	·WA	98108
	GE TUBE MANUFACTURING	4855 WEST ELECTRIC AVENUE	MILWAUKEE	WI	53219
WID980683569	GE E. DALE TROUT	3114 N. GRANDVIEW BLVD.	WAUKESHA	WI	53188
WID006121347	GE APPLIANCES - MILWAUKEE PLANT	2205 SOUTH 43RD STREET	WEST MILWAUKEE	WI	53219

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SCHEDULE A - LIABILITY

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
*********		***************************************		Z2#25	=======================================
110079135133	GE PLASTICS - LINMAR	CANAL ROAD	OTTAWA	IL	61350
MCD0007/2449	GE PLASTICS				
M3D000/42000	GE PEASITUS	PORT BIENVILLE INDUSTRIAL PARK	BAY ST. LOUIS	MS	39521
PRD090383860	CARBIBE GE PRODUCTS INC.	ZENO GANDIA PARK, RTE 120	ADECTIO	D D	00/47
PRD090070459		PO BOX 9069	ARECIBO HUMACAO		00613
PRD090282757	CARIBE GE PRODUCTS, INC.	P.O. BOX 1430	JUANA DIAZ		00661 00665
PRD090510793		P.O. BOX #377	PALMER		00721
PRD090492109	GE-PATILLAS	STATE ROAD #3 KM 122.9			00721
PRD000692590	GE CARIBE PRODUCTS INC., RIO PIEDES				00723
	CARIBE GE PRODUCTS INC.	P.O. BOX 186	SAN GERMAN		00724
PRD000692582	GE CARIBE PRODUCTS, INC. VIEQUES	P.O. BOX 187	VIEQUES		00765
T¥N061382206	GE RAILCAR REPAIR SERVICES CORP.	0.0.000 455 (71770) 0040			
170001302200	SE MAILLAN REPAIR SERVICES LURP.	P.O. BOX 115/IIFFON ROAD	RANGER	TX	76470
VAD980551782	GE FANUC AUTOMATION NORTH AMERICA	RTE 29 NORTH AR RTE 606	CHARLOTTESVILLE	VA	22906
			- : : : - :		
	GE SPECIALTY CHEMICALS, INC.		MORGANTOWN	w	26505
WVD088911854	GE PLASTICS - WOODMAR	STATE ROUTE 892 (PO BOX 68)	WASHINGTON	WV	26181
70741 #401117					

SCHEDULE A - LIABILITY

SCHEDULE 8 - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

03-26-1990 PAGE: 1

EPA ID#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	
*======================================				###=	**==========	**********	=======
CAD030584502			ANAHEIM	CA	27248	0	27248
CAT000611095		11115 VAN OWEN STREET	NORTH HOLLYW	CA	52400	0	52400
CAD009208075 CAD009542721	GE SAN FRANCISCO SERVICE CTR		OAKLAND	CA.	31440	O	31440
CAD053914206	GE EMC/ONTARIO	1923 E. AVION STREET	ONTARIO	CA	35422	0	35422
CAD033914200	GE VALLERCITOS NUCLEAR CENTE	PU BUX 460	PLEASONTON	CA	155135	8 400	163535
	TOTAL STATE FACILITIES: 5		0717F 70711		704445		
	TOTAL STATE PACIFITIES: 5		STATE TOTAL:		301645	8400	310045
CTD001453711	GE	1285 BOSTON AVENUE	BRIDGEPORT	СТ	744080	618320	1362400
CTD000842492	GE WASTEWATER SETTLING AREA	41 WOODFORD AVENUE	PLAINVILLE	CT	2975272	1475989	4451261
					========		========
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		3719352	2094309	5813661
					•		
IAD075836130	CE ADDITANCE CONTROL DEDARTH	1007 DIDIANT BAIR					
1AD005272703	GE APPLIANCE CONTROL DEPARTM	1803 RADIANT ROAD	CARROLL	IA	10809	0	10809
IAD003272703	GE SWITCHGEAR OPERATIONS	510 AGENCY ROAD	W. BURLINGTO	IA	432363	21618	453981
1A00000678037	GE BURLINGTON BASKET COMPANY	1404-1418 WEST PLEASANT ST.	W.BURLINGTON	IA	0	1519600	1519600
	TOTAL STATE FACILITIES: 3				2222222	**********	22222222
	TOTAL STATE TACTETITES. J		STATE TOTAL:		443172	1541218	1984390
OHD000817312	GE AIRCRAFT ENGINES - EVANDA	1 NEUMANN WAY - MD N123	CINCINNATI	ОН	377760	0	377760
OHD000817304	GE ACSC/C	1350 TENNESSEE AVE.	CINCINNATI	OH	37125	0	
OHD074713561	GE CINCINNATI SERVICE CENTER	156 CIRCLE FREEWAY DRIVE	CINCINNATI	OH	6485	0	6485
OHD009101494	GE ACSC/C	333 W. SEYMOUR AVENUE	CINCINNATI	ОН	12966	0	12966
OHD048433080	GE CHEMICAL PRODUCTS	1099 IVANHOE ROAD	CLEVELAND	ОН	1156280	0	1156280
OHD048432975	GE EUCLID SPECIALTY	1133 E. 152ND STREET	CLEVELAND	ОН	405538	0	405538
OHD004302428	GE COSHOCTON PLANT	1350 SOUTH SECOND STREET	COSHOCTON	ОН	118045	O	118045
OHD004227369	GE LIGHTING - TUNGSTEN PRODU	21800 TUNGSTEN ROAD	EUCL ID	ОН	180588	0	180588
OHD000721456	GE ACSC/C	3024 SYMMES RD.	HAMILTON	OH	19819	0	19819
ОНФ048111090	JEFFERSON WELD PLANT	85 W. ASTUBULA	JEFFERSON	OH	126000	0	126000
OHD004176046	GE NILES/MAHONING GLASS	403 N. MAIN STREET	NILES	OH	45099	0	45099
OHD059061317	GE RAVENNA LAMP	6800 N. CHESTNUT STREET	RAVENNA	ОН	30265	0	30265
	GE OHIO LAMP	1210 N. PARK AVENUE	WARREN	ОН	95001	0	95001
	GE TRUMBULL LAMP	1313 W. MARKET STREET	WARREN	ОН	18276	0	18276
OHD004226171	GE YOUNGSTOWN LAMP	40 HUGHES STREET	YOUNGSTOWN	ОН	5405	0	Ś405

	TOTAL STATE FACILITIES: 15		STATE TOTAL:		2634652	0	2634652
					22222222	*******	*========
	TOTAL OWNER/OPERATED FACILITI	ES: 25	TOTAL:		7098821	3643927	10742748

GUARANTEED FACILITIES

03-26-1990

SCHEDULE B - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

PAGE: 2

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
222222222222	**********************			====	=========		
PRD090383860	CARBIBE GE PRODUCTS INC.	ZENO GANDIA PARK, RTE 120	ARECIBO	PR	120520	0	120520
PRD090070459	GE CARIBE	PO BOX 9069	HUMACAO	PR	47160	0	47160
PRD090282757	CARIBE GE PRODUCTS, INC.	P.O. BOX 1430	JUANA DIAZ	PR	49413	0	49413
PRD090510793	GE CARIBE	P.O. BOX #377	PALMER	PR	864726	0	864726
PRD090492109	GE-PATILLAS	STATE ROAD #3 KM 122.9	PATILAS	PR	1941304	0	1941304
PRD000692590	GE CARIBE PRODUCTS INC., RIO	CALLE LA BRISA #5 SABANA LL	RIO PIEDRAS	PR	71339	0	71339
PRD091019224	CARIBE GE PRODUCTS INC.	P.O. BOX 186	SAN GERMAN	PR	42077	0	42077
PRD000692582	GE CARIBE PRODUCTS, INC. VIE	P.O. BOX 187	VIEQUES	PR	66024	262000	328024
					=======	========	========
	TOTAL STATE FACILITIES: 8		STATE TOTAL:	;	3202563	262000	3464563
	•				E=======	========	
	TOTAL SUMMARY	: 8	TOTAL:	:	3202563	262000	3464563

SUMMARY

SCHEDULE B - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

03-26-1990

PAGE: 3

TOTAL ALL FACILITIES: 33

SUM OF ALL C/PC ESTIMATES:

10301384

3905927 14207311



Corporate Environmental Programs General Electric Company 3135 Easton Turnpike, Fairfield, CT 06431

March 15, 1990

Letter from Chief Financial Officer to Demonstrate Both Liability Coverage and Assurance of Closure or Post Closure

U.S. EPA Region V 230 South Dearborn Chicago,IL 60604

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See SCHEDULE A.

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following: SEE SCHEDULE A. The firm identified above is the direct parent corporation of the owner or operator.

- 1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: SEE SCHEDULE B.
- 2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: SEE SCHEDULE B.

- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: SEE SCHEDULE C.
- 4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanism. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None
- 5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

 None

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1989.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed	(Dollars in thousands)			
	above)	\$ <u>45,214</u>			
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ <u>27,000</u>			
3.	Sum of lines 1 and 2	\$ <u>72,214</u>			

Page Three

4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moo AAA - Sta	<u>ody's</u> ndard & Poor's
5.	Date of issuance of bond	11/7/88	
6.	Date of maturity of bond	12/27/92	
7.*	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements, you may add that portion to this line)	\$12,068,00	<u>0</u>
8.*	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	NOT APP	LICABLE
9.	Is line 7 at least \$10 million?	YES X	<u>NO</u>
10.	Is line 7 at least 6 times line 3?	X	
11.*	Are at least 90% of the assets located in the U.S.?	X	
12.	Is line 8 at least 6 times line 3?	X	-

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Dennis D. Dammerman Senior Vice President - Finance March 15, 1990

EXPLANATION OF COST ESTIMATES ADJUSTED DIFFERENT FROM INFLATION FACTOR

EPA ID #	STATUS	EXPLANATION
CAT00061109	 5 I	
CAD05391420	6 I	1-CHANGES IN CLOSURE SCOPE; 2-ANTICIPATION OF RE-LICENSING, LICENSE CHANGES
CAD00081968	0 G	TSD FACILITY OFFICIALLY CLOSED IN 1989.
CAT00061347	1 G	GENERATOR STATUS IN 1989
GAD00330814	5 P	THE 1988 EST. WAS RECALCULATED AT GEORGIA'S REQUEST USING THEIR INFLATOR FACTOR.
ILD00545369	1 I	REVISED FOR SUBMISSION OF INTERIM STATUS CLOSURE
IND006040299	9 N	CLOSURE PLAN SUBMITTED TO STATE, PENDING. LOW COST ESTIMATE FROM ENGINEER
KYD00638702	1 C	GENERATOR STATUS PER STATE CERTIFICATION LETTER DATED 3/21/89 (M. ALAUDDIN).
MID05067662	2 I	CLOSED/REMEDIATED. AWAITING APPROVAL
NCD00323794	ВР	REVISED CLOSURE PLAN TO REFLECT ADDITIONAL COSTS FOR REMEDIAL ACTION SYSTEM.
NCD050409156	0 P	RE-CALCULATED ESTIMATE TO REFLECT LOCALLY AVAILABLE LABOR & MATERIAL COSTS.
NYD00208413	5 I	PART B SUBMITTED TO MY STATE. CHANGED EST. PER DEC COMMENTS PART B APPLICATION.
NYD07109419	7 I	REVISED AS PART OF ONGOING PERMIT APPLICATION WITH NEW YORK STATE.
NYD066832023	3 P	FACILITY 95% CLOSED. REVISED CLOSURE PLAN TO SHOW REMAINING COSTS
NYD002080034	4 P	CLOSURE COSTS FOR INCINERATORS AND TANKS WERE UPDATED, ADDED NEW LANDFILL
OHD000817304	4 I	EST. RE-CALCULATED IN 1989 TO ACCT. FOR ADDITION OF SECOND AREA TO BE CLOSED.
OHD000721456	5 I	ESTIMATE SUBMITTED LAST YEAR WAS IN ERROR (i.e. overinflated)
OHD048111090	M C	ADDITION TO RCRA FA 1989 LIST PER CONSENT ORDER - SOLD 1987
PAD003026903	3 M	SOLD 7/87
PRD090306077	7 G	GENERATOR STATUS PER "COMMONWEALTH" LETTER DATED 9/28/89 (S. BATANCOURT)
SCD067002147	7 P	ESTIMATE REVISED DUE TO CHANGE IN GROUND WATER SAMPLING METHODS.
TXD079400545	5 G	GENERATOR REGISTRATION DATED 3/88
TXD061382206	s c	RCRA CLOSURE COMPLETED 7/89 - NOT YET CERTIFIED.
VAD003132255	5 G	FACILITY CERTIFIED CLOSED IN ACCORDANCE WITH STATE APPROVED CLOSURE PLAN.
VAD070360219	1	ESTIMATE IN ACCORDANCE WITH REVISED CLOSURE PLAN APPPROVED BY VIRGINIA AUG. 1989
WAD046207379	s	FACILITY SOLD. TSDF STATUS UNKNOWN.
WID000808717	7 G	TSD FACILITY OFFICIALLY CLOSED IN 1989.
WID006121354	G	TSD FACILITY OFFICIALLY CLOSED IN 1989.
WID006121347	7 1	STORAGE NO LONGER USED. TANKS REMOVED
WID000808725	G	TSD FACILITY OFFICIALLY CLOSED IN 1989.

Total Facilities: 30

13000

OWNER/OPERATED FACILITIES

03-26-1990

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

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PAGE:	1	
. 701/		
- 11111	4 L	

EPA ID#	FACILITY	STREET	CITY	ST		POST CLOS.	
						********	*********
ALD981026677	GE PLASTICS-BURKVILLE OPERAT	ONE PLASTICS DRIVE	BURKVILLE	AL	46555	0	46555
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		46555	0	46555
FLD001690924	GE SIMULATED & CONTROL SYSTE	1800 VOLUSTA AVENHE	DAYTONA BEAC	EI	20960	0	200/0
	TOTAL STATE FACILITIES: 1	TOTAL TOTAL AVENUE	STATE TOTAL:		22222222	*******	20960
	TOTAL STATE TAGELITES. T	·	STATE TOTAL:		20960	0	20960
GAD003308145	GE MEDIUM TRANSFORMER OPERAT	1935 REDMOND CIRCLE	ROME	GA	236100	0	236100
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		236100	0.	236100
1LD005453691	GE GENERAL PURPOSE CONTROLS	1601 GE ROAD	BLOOMINGTON	ĪL	92580	0	92580
ILD070015714	GE SERVICE SHOP - CHICAGO	6045 SOUTH NOTTINGHAM	CHICAGO	IL	10809	0	10809
ILD980503023	GE	1540 S. 54TH AVENUE	CICERO	IL	38912	19456	58368
1LD005443866	GE MATTON LAMP	1501 S. 19TH STREET	MATTON	IL	23312	0	23312
ILD062338694	GEIPS - MORRIS PLANT	7555 E. COLLINS ROAD	MORRIS	IL	92224	0	92224
ILD005272992	GE APPLIANCE CONTROLS	709 W. WALL STREET	MORRISON	ΙL	209600	0	209600
					*******	========	*******
	TOTAL STATE FACILITIES: 6		STATE TOTAL:		467437	19456	486893
IND000803726	GE BLOOMINGTON PLANT OPERATI	301 NORTH CURRY PIKE	BLOOMINGTON	IN	84784	0	84784
IND004557815	GE SPECIALTY TRANSFORMER OPE	1701 COLLEGE STREET	FORT WAYNE	IN	47160	0	47160
IND005448683	GE GENERAL PURPOSE MOTOR (AN	2000 TAYLOR STREET	FORT WAYNE	IN	20960	0	20960
IND006040299	GENERAL ELECTRIC COMPANY	12TH ST. SE. P.O. BOX 657	LINTON	IN	23600	O	23600
IND006376362	GE PLASTICS	LEXAN LANE	MT. VERON	IN	39129	0	39129
		•			========	========	
	TOTAL STATE FACILITIES: 5		STATE TOTAL:		215633	0	215633
KSD041917501	GE-AEMC	STROTHER FIELD	ARKANSAS CIT	KS	28540	0	28540
					*********	******	******
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		28540	0	28540
		APPLIANCE PARK 26-101	LOUISVILLE	KY	0	0	. 0
KYD074047556	GE AIRCRAFT ENGINES	US HIGHWAY 41A ROUTE 2	MADISONVILLE	KY	194928	0	194928
					========	========	******
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		194928	0	194928
LAD053782413	GE NEW ORLEANS SERVICE CENTE	1115 DEARMAS STREET	NEW ORLEANS	LA	19456	0	19456
					*********		=======================================
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		19456	.0	19456

OWNER/OPERATED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

03-26-1990 PAGE: 2

EPA ID#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	TOTAL
	GE APPLIANCE PARK-EAST	9001 SNOWDEN RIVER PARKWAY	COLUMBIA	MD	0	2339418	2339418
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		0	2339418	2339418
MND980501407	GE MINNEAPOLIS SERVICE CENTE	2025 49TH AVENUE NORTH	MINNEAPOLIS	MN	12971	•	
			MINNEAU OF 13	M		0	12971
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		12971	0	12971
					.27.1	Ū	127/1
	GE MOTORS - SPRINGFIELD	E.SUNSHINE	SPRINGFIELD	МО	24590	0	24590
MOD006312375	GE ST. LOUIS LAMP	6251 ETZEL AVENUE	ST. LOUIS	МО	37832	0	37832
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		62422	0	62422
NCD003237948	GE HICKORY TRANSFORMER PLANT	1223 FAIRGROVE CHURCH ROAD	HICKORY	NC	33700	5277000	5310700
NCD050409150	GE NUCLEAR FUEL & COMPONENT	CASTLE HAYNE RD. MC J26	WILMINGTON .	NC	89515	0	89515
					********	=========	252223222
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		123215	5277000	5400215
NYD093256063	GE CAPACITOR & POWER PROTECT	381 UPPER BROADWAY	FORT EDWARD	NY	530619	0	F70/+0
NYD002080075	GE CAPACITOR & POWER PROTECT		HUOSON FALLS	NY	232078	0	530619 232078
NYD002084135	GE	1 RIVER ROAD, BUILDING 41-1		NY	1273642	0	1273642
NYD071094197	GE CORPORATE RESEARCH & DEVE		SCHENECTADY	NY	682606	0	682606
NYD066832023	GE PLASTICS - SELKIRK OPERAT	NORYL AVENUE	SELKIRK	NY	394084	147533	541617
NYD059385120	GE ELECTRONICS PK, BG 7 CHEM	ELECTRONICS PARK, BLG. 9, R	SYRACUSE	NY	46189	0	46189
NYD067539940	GE BUFFALO SERVICE CENTER	175 MILENS ROAD	TONAWANDA	NY	319103	0	319103
NYD000521971	GE AEROSPACE ELECTRONIC SYST		UTICA	NY	20960	0	20960
NYD002080034	GE SILICONE PRODUCTS DIVISIO	260 HUDSON RIVER ROAD	WATERFORD	NY	11967361	2267100	14234461
					=======================================	=======================================	========
	TOTAL STATE FACILITIES: 9		STATE TOTAL:		15466642	2414633	17881275
SCD067002147	GE MEDICAL SYSTEMS	3001 WEST RADIO DRIVE	FLORENCE	sc	146628	1248168	1394796
				-		2222222	
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		146628	1248168	1394796
	GE DALLAS SERVICE CENTER	3202 MANOR WAY	DALLAS	TX	10809	0	10809
TXD060718269	GE HOUSTON SERVICE CENTER	8800 WALLISVILLE ROAD	HOUSTON	TX	363561	0	363561
					=========	=======================================	*********
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		374370	0	374370
VAD003132255	GE MOBILE COMMUNICATIONS	MOUNTAIN VIEW ROAD	LYNCHBURG	VA	70427	•	. 70404
VAD070360219	GE WINCHESTER LAMP	ROUTE 3, PO BOX 310	WINCHESTER	VA	79124 61410	0	79124
		,	I TOTAL OF LA	**		0	61410
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		140534	0	140534

OWNER/OPERATED FACILITIES

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SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

:PA 1D#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	-
VTD002083434	GE ARMAMENT SYSTEMS DEPARTME	LAKESIDE AVENUE	BURLINGTON	VT	50687	0	50687
					EESSTEERS:	######################################	=======
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		50687	0	50687
WAD009278706	GE GEAE SCMC/SEATTLE	220 SOUTH DAWSON STREET	SEATTLE	WA	36474	0	36474
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		36474	0	36474
							22222222
	TOTAL OWNER/OPERATED FACILITI	ES: 40	TOTAL:		17643552	11298675	28942227

GUARANTEED FACILITIES

03-26-1990

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

PAGE: 4

EPA ID#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	
			*************		2022222222	***********	######################################
110079135133	GE PLASTICS - LINMAR	CANAL ROAD	OTTAWA	ΙŁ	3 6274	0	36274
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		36274	0	36274
MCD0007/2449	GE PLASTICS	PORT RISHWALLS AND MATERIAL STATES			454155	_	
HSD000742886	de PLASTICS	PORT BIENVILLE INDUSTRIAL P	BAY SI. LOUI	MS	151450	0	151430
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		151430	0	151430
TXD061382206	GE RAILCAR REPAIR SERVICES C	P.O. BOX 115/TIFFON ROAD	RANGER	TX	1000000	524000	1524000
	TOTAL STATE FACILITIES: 1		PILIT TOTAL		4000000	********	22222222
	TOTAL STATE PACIENTES:		STATE TOTAL:		1000000	524000	1524000
VAD980551782	GE FANUE AUTOMATION NORTH AM	RTE 29 NORTH AR RTE 606	CHARLOTTESVI	VA	161400	0	161400
				•	*********	********	2222222
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		161400	0	161400
WVD980552384	GE SPECIALTY CHEMICALS, INC.			wv	156383	0	156383
WVD088911854	GE PLASTICS - WOODMAR	STATE ROUTE 892 (PO BOX 68)	WASHINGTON	W۷	34578	0	34578

	TOTAL STATE FACILITIES: 2		STATE TOTAL:		190961	0	190961
	TOTAL SUMMARY	. 4	245		45/00/5		=========
	IUIAL SUMMARI	: 6	TOTAL:		1540065	524000	2064065

SUMMARY

03-26-1990

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

PAGE: 5

TOTAL ALL FACILITIES: 46

SUM OF ALL C/PC ESTIMATES:

19183617

11822675 31006292



Certified Public Accountants

Stamford Square 3001 Summer Street Stamford, CT 06905

March 15, 1990

Mr. Dennis D. Dammerman Senior Vice President - Finance General Electric Company 3135 Easton Turnpike Fairfield, CT 06431

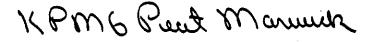
Dear Mr. Dammerman:

We have applied certain agreed-upon procedures, as discussed below, with respect to Part B of your letter on behalf of General Electric Company to the Environmental Protection Agency dated March 15, 1990. It is understood that these procedures were performed solely to assist you in connection with filing the above mentioned letter, and our report is not to be used for any other purpose. Our procedures and findings are as follows:

- The dollar amount of tangible net worth included under item 7, Part B, letter page three We compared the dollar amount of tangible net worth, which represents total share owners' equity less total intangible assets, to the difference between amounts shown on the "Statement of Financial Position" Page 28 of the Company's 1989 Annual Report for total share owners' equity and intangible assets and found them to be in agreement.
- To determine that the "Not Applicable" response to item 8, Part B, letter page three, and the positive response to item 11, Part B, letter page three were correct, we compared the amount of United States assets included in the geographic segment information disclosed in Note 34 on Page 68 of the Company's 1989 Annual Report to the product of 90% times total assets as shown on the "Statement of Financial Position" Page 28 of the Company's 1989 Annual Report and found that the dollar amount of assets in the United States was greater than the result of the computation described above.

Because the above procedures do not constitute an audit made in accordance with generally accepted auditing standards, we express no opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified amounts or items should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only the amounts and items specified above and does not extend to any financial statements of General Electric Company and consolidated affiliates taken as a whole.

Very truly yours,





y, x, 8, FAD, 3 SS



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Financial Record Review



Richard F. Celeste

Governor

. June 31, 1987

Re: General Electric
OHD000721456/05-09-0374OHD000817304/05-31-0376OHD000817312/05-31-0305OHD0004176046/02-78-0163OHD004224960/02-78-0164OHD004226171/02-50-0154OHD004227369/02-18-0167OHD004302428/04-16-0024/
OHD009101494/05-31-0375OHD048111090/02-04-0161OHD048432915/02-18-0176OHD048433080/02-18-0168OHD059061317/02-67-0158OHD066052804/02-78-0153-

Dennis D. Dammerman Senior Vice President-Finance General Electric Company 1 River Road Schenectady NY 12345

Dear Mr. Dammerman:

I have received General Electric's financial test for fiscal 1986 submitted to this agency in order to demonstrate compliance with Ohio rules which require financial responsibility for closure and post-closure costs and liability coverage from hazardous waste treatment, storage or disposal facilities.

My review of the documents reveals that they are acceptable evidence of compliance with these requirements.

Therefore, the facilities referenced above have met the financial responsibility requirements of Ohio's hazardous waste rules.

If you have any questions, please contact me at (614)481-7234.

Sincerely,

David Mentzer

S&E Section, DSHWM

DM/drr

cc: Mike Savage, CO
Dave Wertz, NEDO
Don Marshall, SWDO
Ken Dewey, SEDO
RF

GENERAL & ELECTRIC

OHD-059-861-317

Letter from Chief Financial Officer to Demonstrate
Liability Coverage or to Demonstrate Both Liability Coverage
and Assurance of Closure or Post-Closure Care

March 27, 1986

Regional Administrator EPA Region V 230 South Dearborn Street Chicago, IL 60604



I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of this firm's use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Schedule I

- 1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Schedule II
- 2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: See Schedule III
- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test or guarantee are shown for each facility: See Schedule IV

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MAR 3 1 1986

U. S. EPA REGION &

GENERAL 🍪 ELECTRIC

Page Two

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure, or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

		(Dollars in thousands)
1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$46,076
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ 8,000
3.	Sum of lines 1 and 2	\$54,076
4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moody's AAA - Standard & Poor's
5.	Date of issuance of bond	May 1974
6.	Date of maturity of bond	May 2004
* 7.	Tangible net worth (if any portion of the closur or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	
*8 <u>-</u>	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 22,733,000

GENERAL & ELECTRIC

Page Three

	YES	<u>NO</u>
9. Is line 7 at least \$10 million?	<u> x</u>	
10. Is line 7 at least 6 times line 3?	X	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12		<u>x</u>
12. Is line 8 at least 6 times line 3?	<u>x</u>	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264151(g) as such regulations were constituted on the date shown immediately below.

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Page Four

Dennis D. Dammerman Senior Vice President-Finance March 27, 1986

	CLOSURE	POST-CLOSURE
SCHEDULE II	16359	7714
SCHEDULE III	1278	0 /
SCHEDULE IV	17423	33 02
#S==3==		=======================================
TOTAL	35060	11016
GRAND TOTAL FOR CLOSURE AND/OF	R POST-CLOSURE4	6076

-

r

SCHEDULE I

*			STREET	CITY	STATE	ZIP
REGION	EPA ID	LOCATION	TIME			·
01	CTD000842492	DISTRIBUTION EQUIPMENT DIV.	SENT ST.	PLAINVILLE	CT	06062
•	CTD001453711	BRIDGEPORT AREA RELATIONS OPR.	1285 BOSTON AVENUE	BRIDGEPORT	CT	06602
	MED051431906	DISTR EQHT - CIRCUIT PROT	RODMAN ROAD	AUBURN	ME	04210 05401
	VTD002083434	ARMAMENT SYSTEMS DEPT	LAKESIDE AVENUE	BURLINGTON	VT	
02	NJD003918570	NEW YORK SERVICE SHOP	6001 TONNELLE AVENUE	NORTH BERGEN	NJ	07047 14843
	NYD002080034	SILICONE PRODS DIV	260 HUDSON RIVER RD	WATERFORD	NY	
	NYD002080075	CAPACITOR TRADS DPT	8 JOHN STREET	HUDSON FALLS	NY	12839
	NYD002084135	SCHENECTADY UTILITIES OP	1 RIVER ROAD	SCHENECTADY	NY	12345
	NYD002231272	SEMICONDUCTOR PRODS DPT	W GENESEE ST. ROAD	AUBURN	NY	13021
	NYD002235182	AERO CONTROL SYS OPT	600 MAIN STREET	JOHNSON CITY	NY	13790
	NYD052987096	ELECTROMATERIALS BUS DEPT	1 CAMPBELL ROAD	SCHENECTADY	NY	12345
	NYD066832023	NORYL PRODUCTS DIVISION	NORYL AVENUE	SELKIRK	NY	12158
	NYD067539940	BUFFALO SERVICE SHOP	175 MILLENS ROAD	TONAWANDA	NY	14150 12309
	NYD071094197	CORPORATE R&D	RIVER ROAD	NISKAYUNA	NY	12828
	NYD093256063	CAPACITOR PRODS DPT	7325 BROADWAY	FORT EDWARD	NY	00765
	PRD000692582	CARIBE GENERAL ELECTRIC PROD	ROUTE 993 BARRIO	VIEQUES	PR PR	00765
	PRD000692590	CARIBE GENERAL ELECTRIC PROD	LA BRISA NO 5	RIO PIEDRAS		
	PRD090070459	CARIBE GENERAL ELECTRIC PROD	STATE RD 3 K 82	HUMACAO	PR	00762 00665
	PRD090282757	CARIBE GENERAL ELECTRIC PROD	KM 67 CARRETARA 149	JUANA DIAZ	PR PR	00731
	PRD090306077	CARIBE GENERAL ELECTRIC PROD	EL TUQUE INDT PARK	PONCE	PR	00/31
	PRD090383860	CARIBE GENERAL ELECTRIC PROD	RT 129, KM41	ARECIBO	PR	00723
	PRD090492109	CARIBE GENERAL ELECTRIC PROD	P.O. BOX 968	PATILLAS		00723
	PRD090510793	CARIBE GENERAL ELECTRIC PROD	ROUTE 191 KM 5	PALMER	PR PR	00745
	PRD091019224	CARIBE GENERAL ELECTRIC PROD	EL RETIRO IND PRK	SAN GERMAN	MD	21045
03	MDD046279311	COLUMBIA R & U OPERATION	APPLIANCE PARK EAST	COLUMBIA		19406
	PAD001680719	SPACE DIV-VALLEY FORGE	230 GODDARD BLVD.	KING OF PRUSSIA	PA	16531
	PAD005033055	TRANS SYST BUS OPS	2901 EAST LAKE ROAD	ERIE	PA PA	18127
	PAD059290908	TRANS SYS BUS OPS	INDUSTRIAL DRIVE	GROVE CITY		15017
	PAD060682622	BRIDGEVILLE GLASS PLANT	MAYER STREET	BRIDGEVILLE	PA	24502
	VAD003132255	MOBILE COMM BUS DPT	MOUNTAIN VIEW ROAD	LYNCHBURG	VA VA	22601
	VAD070360219	WINCHESTER LAMP PLANT	ROUTE 3 BOX 310	WINCHESTER	VA VA	22901
	VAD980551782	INDUSTRIAL CONTROL DEPARTMENT	ROUTE 29N AT TR 6066	CHARLOTTESVILLE	AL	36725
04	ALD980600035	PLASTICS BUSINESS OP	ROUTE 1 BOX 21	BURKVILLE	FL	32105
	FLD001690924	SIMULATION & CNTL SYS DPT	1800 VOLUSIA AVENUE	DAYTONA Gainesville	FL	32602
	FLD043860451	BATTERY BUS DPT	HIGHWAY 441 NORTH	BOWE	GA	30161
	GAD003308145	MEDIUM TRANSFORMER DPT	REDMOND CIRCLE	LOUISVILLE	ΚΥ	42301
	KYD006387021	MA MANUFACTURING DIV	APPLIANCE PARK BLDG	MADISONVILLE	ΚΥ	42431
	KYD074047556	AEBG	US HIGHWAY 41A	HICKORY	NC.	28603
	NCD003237948	DIST TRANS BUS DPT	FAIRGROVE CHURCH RD CASTLE HAYNE	WILMINGTON	NC	28401
	NCD050409150	NUCLEAR ENERGY BUS OF	3001 W RADIO DRIVE	FLORENCE	SC	29501
	SCD067002147			MORRISTOWN	TN	37814
	TND066709130	DISTRIBUTION EQHT DIV	EAST MORRIS BLVD S 4TH STREET	SELMER	TN	38375
	TND078565249	DISTRIBUTION EQHT DIV	709 WEST WALL STREET	MORRISON	ΪĹ	60644
05	ILD005272992			MATTON	IL	61938
	ILD005443866	HATTON LAMP PLANT	1501 S 19TH STREET	BLOOMINGTON	ΙĹ	61701
	ILD005453691	GENERAL PURPOSE CONTROL DEPT	VETERANS PARKWAY	MORRIS	ĪĹ	60450
	ILD062338694		7555 EAST COLLINS RD	CHICAGO	ĬĹ	60638
	ILD070015714		6045 S NOTTINGHAM AV	CICERO	ΪĹ	60650
	ILD980503023		1540 S 54TH	BLOOMINGTON	IN	47402
	_/IND000803726	MA MANUFACTURING DIV	301 NORTH CURRY PIKE	DECEMBER 1 ON	714	7/796

050101	COA TO	LOCATION	STREET	CITY	STATE	ZIP
REGION	EPA ID			FORT WAYNE	IN	46804
	IND004557815	SPECIALTY TRANSF DPT	1701 COLLEGE STREET	DECATUR	IN	46733
	IND005422084	GENL PURPOSE MOTOR DPT	500 NORTH 9TH STREET	FORT WAYNE	IN	46804
	IND005448683	GENL PURPOSE MOTOR DPT	2000 TAYLOR STREET	LINTON	IN	46804
	IND0060402 99	GENERAL PURPOSE MTR DEPT	TWELFTH STREET SE	MOUNT VERNON	IN	47620
	IND006376362	LEXAN PRODUCTS DIVISION	LEXAN LANE 13TH & PAYNE STREETS	TELL CITY	IN	47856
	IND006392773	SPECIALTY MOTOR DEPT	11177 E 8 MILE ROAD	WARREN	MI	48089
	MID044254423	CARBOLOY SYSTEMS DPT	18704 KRAUSE STREET	RIVERVIEW	ΗÏ	48192
	MID050616622 ·	DETROIT SERVICE SHOP	2025 49TH AVENUE N	MINNEAPOLIS	MN	55430
	MNT280010398	MINNEAPOLIS SERVICE SHOP	3024 SYMMES ROAD	HAMILTON	ОН	45015
	OHD000721456	AVIATION SERVICE DEPARTMENT	1350 TENNESSEE AVE	CINCINNATI	OH	45229
	OHD000817304	AVIATION SERVICE DEPARTMENT	1350 TENNESSEE AVE	EVENDALE	OH	45215
	OHD000817312	AEBG	403 N MAIN STREET	NILES	OH	44446
	OHD004176046	NILES GLASS PLANT	1313 W MARKET STREET	WARREN	OH	44485
	OHD004224960	TRUMBULL LAMP PLANT	40 HUGHES STREET	YOUNGSTOWN	OH	44502
	OHD004226171	YOUNGSTOWN LAMP PLANT	21800 TUNGSTEN ROAD	EUCLID	OH	44117
	OHD004227369	REFR HETALS PROD DPT	1350 S SECOND STREET	COSHOCTON	OH	43812
	OHD004302428	ELECTROMATERIALS BUS DEPT	333 W SEYMOUR AVE	CINCINNATI	OH	45216
	DHD009101494	AVIATION SERVICE DEPARTMENT	85 W ASTUBULA	JEFFERSON	OH	44047
	OHD048111090	JEFFERSON WELD PLANT	1122 E 152ND STREET	CLEVELAND	OH	44110
	OHD048432975	LIGHTING REL & OPS	1099 IVANHOE ROAD	CLEVELAND	OH	44110
	OHD048433080	CHEMICAL PRODUCTS PLANT	6880 N CHESTNUT ST	RAVENNA	OH	44110
	OHD059061317	RAVENNA LAMP PLANT	1210 N PARK AVENUE	WARREN	OH	45660
	OHD066052804	OHIO LAMP- WARREN	156 CIRCLE FREEWAY	CINCINNATI	ОН	45246
	OHD074713561	CINCINNATI SERVICE SHOP	NELA PARK, NOBEL RD	E CLEVELAND	ОН	44112
_	OHD085240133	NELA PARK FACILITY SPECIALTY MOTOR DEPARTMENT	101 GEE STREET	JONESBORO	AR	72401
06	ARD007037823		7000 FLOURNDY-LUCAS	SHREVEPORT	LA	71109
	LAD043197284	DISTR TRANS BUS DPT NEW ORLEANS SERVICE SHOP	1115 DE ARMAS STREET	NEW ORLEANS	LA	70114
	LAD053782413	HOUSTON SERVICE SHOP	8800 WALLISVILLE RO	HOUSTON	ΤX	77029
	TXD060718269 TXD064114242	DALLAS SERVICE SHOP	3202 MANOR WAY	DALLAS	TX	75235
	TXD079400545	DISTRIBUTION EQUIPMENT DIV.	3530 W 12TH STREET	HOUSTON	TX	77008
	IAD000678037	POWER DELIVERY	1404/18 W MT PLEASAN	W BURLINGTON	IA	52655
07		SWITCHGEAR BUSINESS DEPT	510 AGENCY ROAD	W BURLINGTON	IA	51401
	IAD005272703 IAD075836130	APPLIANCE CONTROL DEPARTMENT	1803 RADIANTNCY	CARROLL	IA	51401
	KSD041917501	AVIATION SERVICE DEPARTMENT	STROTHER FIELD	ARKANSAS CITY	KS	67005
	MOD006312375	ST LOUIS LAMP PLANT	6251 ETZEL AVENUE	ST LOUIS	MO	63133
	MOD030709539	SPECIALTY MOTOR DEPARTMENT	2401 SUNSHINE STREET	SPRINGFIELD	MO	65804
08	COD062753702	DENVER SERVICE SHOP	4900 KINGSTON ST	DENVER	CO	80239
89	CAD000819680	MEDICAL SYSTEMS BUSINESS OPS	3920 SECURITY PARK	RANCHO CORDOVA	CA	95670
Q-3	CAD009208075	SAN FRANCISCO SERVICE SHOP	5441 E 14TH STREET	OAKLAND	CA	94601
	CAD009542721	AVIATION SERVICE DEPARTMENT	ONTARIO INTL AIRPORT	ONTARIO	CA	91761
	CAD030584502	LA SERVICE SHOP	3601 E LA PALMA ST	ANAHEIM	CA	92806
	CAD053914206	NUCLEAR ENERGY REL & UTIL	6705 VALLECITOS RD	SUNOL	ÇA	94566
	CAD980818512	AEBG ASO/ONTARIO-CHINO	13477 YORBA	CHINO	CA	91710
	CAT000611095	DISTRIBUTION EQUIPMENT DIV	11115 VANOWEN ST	N HOLLYWOOD	CA	91605
	CAT000613471	NUCLEAR ENERGY REL & UTIL	175 CURTNER	SAN JOSE	CA	95125
10	ORD001818442	PORTLAND SERVICE SHOP	2727 NW 29TH AVE	PORTLAND	OR	97210
1.0	WAD009278706	AVIATION SERVICE DEPARTMENT	220 SOUTH DAWSON ST	SEATTLE	WA	98108
	WAD046207379	SEATTLE SERVICE SHOP	1031 4TH AVENUE N	KENT	WA	98031

SCHEDULE II

REGION	EPA ID	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
	CTD000842492	DISTRIBUTION EQUIPMENT DIV.	SENT ST.	PLAINVILLE	CT	06062	1032	0
01			1285 BOSTON AVENUE	BRIDGEPORT	CT	06602	195	480
	CTD001453711	DISTR EOMT - CIRCUIT PROT	RODMAN ROAD	AUBURN	ME	04210	17	0
	MED051431906		260 HUDSON RIVER RD	WATERFORD	NY	14843	9830	3394
02	NYD002080034		8 JOHN STREET	HUDSON FALLS	NY	12839	215	0
	NYD002080075		1 RIVER ROAD	SCHENECTADY	NY	12345	319	0
	NYD002084135	SCHENECIANI UILLIILES OF	W GENESEE ST. ROAD	AUBURN	NY	13021	127	0
	NYD002231272	SEMICONDUCTOR PRODS DPT	600 MAIN STREET	JOHNSON CITY	NY	13790	6	0
,		AERO CONTROL SYS DPT	1 CAMPBELL ROAD	SCHENECTADY	NY	12345	242	0
	NYD052987096	ELECTROMATERIALS BUS DEPT	NORYL AVENUE	SELKIRK	NY	12158	441	3840
	NYD066832023			TONAWANDA	NY	14150	103	0
	NYD067539940		175 MILLENS ROAD RIVER ROAD	NISKAYUNA	NY	12309	160	Ŏ
	NYD071094197	CORPORATE R&D		FORT EDWARD	NY	12828	451	Ō
	NYD093256063	CAPACITOR PRODS DPT	7325 BROADWAY	BURKVILLE	AL	36725	40	Ŏ
14	ALD980600035	PLASTICS BUSINESS OP	ROUTE 1 BOX 21	WARREN	HI	48089	7	ñ
5		CARBOLOY SYSTEMS DPT	11177 E 8 MILE ROAD		MI	48192	Ś	ň
	MID050616622		18704 KRAUSE STREET	RIVERVIEW	OH Lit	45015	i	ñ
	-OHD000721456	AVIATION SERVICE DEPARTMENT	3024 SYMMES ROAD	HAMILTON	OH	45229	i	ň
		AVIATION SERVICE DEPARTMENT	1350 TENNESSEE AVE	CINCINNATI	OH	45215	52	n
	OHO000817312		175 NEUMANN WAY	EVENDALE		44446	38	Ô
		NILES GLASS PLANT	403 N MAIN STREET	NILES	OH OH	44485	16	Ŏ
	OHD004224960	TRUMBULL LAMP PLANT	1313 W MARKET STREET	WARREN	OH	44502	51	ň
t		YOUNGSTOWN LAMP PLANT	40 HUGHES STREET	YOUNGSTOWN	OH	44117	148	ň
	OHD004227369	REFR METALS PROD DPT	21800 TUNGSTEN ROAD	EUCLID	OH OH	43812	104	N O
10	OHD004302428	ELECTROMATERIALS BUS DEPT	1350 S SECOND STREET		OH	45216	2	Ň
10		AVIATION SERVICE DEPARTMENT	333 W SEYMOUR AVE	CINCINNATI		44047	19	ň
	OHD048111090		85 W ASTUBULA	JEFFERSON	OH	44110	347	n
	OHD048432975	LIGHTING REL & OPS	1122 E 152ND STREET	CLEVELAND	OH	44110	983	ň
		CHEMICAL PRODUCTS PLANT	1099 IVANHOE ROAD	CLEVELAND	OH OH	44110	22	0
	DHD059061317	RAVENNA LAMP PLANT	6880 N CHESTNUT ST	RAVENNA		45660	81	n
	DHD066052804		1210 N PARK AVENUE	WARREN	OH	45246	9	^
	OHD074713561	CINCINNATI SERVICE SHOP	156 CIRCLE FREEWAY	CINCINNATI	OH OH	44112	182	0
	OHD085240133	NELA PARK FACILITY	NELA PARK, NOBEL RD	E CLEVELAND			150	0
07	IAD000678037		1404/18 W MT PLEASAN	W BURLINGTON	IA	52655	93	0
	IAD005272703	SWITCHGEAR BUSINESS DEPT	510 AGENCY ROAD	W BURLINGTON	IA	51401	8 8	0
	IAD075836130	APPLIANCE CONTROL DEPARTMENT	1803 RADIANTNCY	CARROLL	IA	51401	_	0
19	CAD000819680		3920 SECURITY PARK	RANCHO CORDOVA	CA	95670	25	•
	CAD009208075	SAN FRANCISCO SERVICE SHOP	5441 E 14TH STREET	DAKLAND	CA	94601	5	U
	CAD009542721	AVIATION SERVICE DEPARTMENT	ONTARIO INTL AIRPORT		CA	91761	21	V
	CAD030584502		3601 E LA PALMA ST	ANAHEIM	CA	92806	16	U
	CAD053914206	NUCLEAR ENERGY REL & UTIL	6705 VALLECITOS RD	SUNOL	CA	94566	69	V
	CAD980818512		13477 YORBA	CHINO	CA	91710	8	U
	CAT000611095		11115 VANOWEN ST	N HOLLYWOOD	CA	91605	19	U
	CAT000613471	NUCLEAR ENERGY REL & UTIL	175 CURTNER	SAN JOSE	CA	95125	699	0

7714.00000 (Tot PCLOSURE85)

16359.00000 (Tot CLOSURE85)

SCHEDULE III

REGION	EPA ID	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
02	PRD090070459 PRD090282757 PRD090306077 PRD090383860 PRD090492109	CARIBE GENERAL ELECTRIC PROD	ROUTE 993 BARRIO LA BRISA NO 5 STATE RD 3 K 82 KM 67 CARRETARA 149 EL TUQUE INDT PARK RT 129, KM41 P.O. BOX 968 ROUTE 191 KM 5 EL RETIRO IND PRK	VIEQUES RIO PIEDRAS HUMACAO JUANA DIAZ PONCE ARECIBO PATILLAS PALMER SAN GERMAN	PR PR PR PR PR PR PR PR	00765 00924 00762 00665 00731 00612 00723 00721	38 21 115 42 3 65 154 830 10	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

1278.00000 (Tot CLOSURE85)

SCHEDULE IV

REGION	EPA ID	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
	VTD002083434	ARMAMENT SYSTEMS DEPT	LAKESIDE AVENUE	BURLINGTON	VŤ	05401	77	0
01 03	MUDUIZ003434	COLUMBIA R & U OPERATION	APPLIANCE PARK EAST	COLUMBIA	MD	21045	130	187
03	04000401/9311	SPACE DIV-VALLEY FORGE	230 GODDARD BLVD.	KING OF PRUSSIA	PA	19406	66	0
	DADOOCO33055	TRANS SYST BUS OPS	2901 EAST LAKE ROAD	ERIE	PA	16531	84	184
	PADGGGGGGGG	TRANS SYS BUS OPS	INDUSTRIAL DRIVE	GROVE CITY	PA	18127	65	0
	PAD039290908	BRIDGEVILLE GLASS PLANT	MAYER STREET	BRIDGEVILLE	PA	15017	\$06	0
	VADO00002022	MOBILE COMM BUS DPT	MOUNTAIN VIEW ROAD	LYNCHBURG	VA	24502	40	0
	VADOUSTSEESS	WINCHESTER LAMP PLANT	ROUTE 3 BOX 310	WINCHESTER	VA	22601	28	0
	VADG70300213	INDUSTRIAL CONTROL DEPARTMENT	ROUTE 29N AT TR 6066	CHARLOTTESVILLE	VA	22901	51	0
04	ELDOD1690924	SIMULATION & CNTL SYS DPT	1800 VOLUSIA AVENUE	DAYTONA	FL	32105	97	0
U 1	FLD043860451		HIGHWAY 441 NORTH	GAINESVILLE	FL	32602	6171	1309
	CAD003308145	MEDIUM TRANSFORMER DPT	REDMOND CIRCLE	ROME	GA	30161	200	0
	KYD006387021		APPLIANCE PARK BLDG	LOUISVILLE	KY	42301	144	0
	KYD074047556		US HIGHWAY 41A	MADISONVILLE	KY	42431	40	0
	NCD003237948		FAIRGROVE CHURCH RD	HICKORY	NC	28603	70	344
	NCD050409150		CASTLE HAYNE	WILMINGTON	NC	28401	79	0
	SC0067002147		3001 W RADIO DRIVE	FLORENCE	SC	29501	2933	507
	TND066709130		EAST MORRIS BLVD	MORRISTOWN	TN	37814	660	0
	TND078565249		S 4TH STREET	SELMER	TN	38375	373	0
05		APPLIANCE CONTROL DPT	709 WEST WALL STREET	MORRISON	IL	60644	10	0
••	ILD005443866		1501 S 19TH STREET	MATTON	IL	61938	19	U
	ILD005453691		VETERANS PARKWAY	BLOOMINGTON	IL	61701	33	Ü
	ILD062338694		7555 EAST COLLINS RD	MORRIS	IL	60450	3	0
		CHICAGO SERVICE SHOP	6045 S NOTTINGHAM AV	CHICAGO	IL	60638	8	U
	ILD980503023		1540 S 54TH	CICERO	IL	60650	33	0
		MA MANUFACTURING DIV	301 NORTH CURRY PIKE		IN	47402	72	0
/	\ IND004557815		1701 COLLEGE STREET	FORT WAYNE	IN	46804	5	0
	IND005422084	GENL PURPOSE MOTOR DPT	500 NORTH 9TH STREET		IN	46733	6	0
	IND005448683		2000 TAYLOR STREET	FORT WAYNE	IN	46804	20	0
		GENERAL PURPOSE MTR DEPT	TWELFTH STREET SE	LINTON	IN	46804	9	0 564
	IND006376362	LEXAN PRODUCTS DIVISION	LEXAN LANE	MOUNT VERNON	IN	47620	3640	
	IND006392773	SPECIALTY MOTOR DEPT	13TH & PAYNE STREETS	TELL CITY	IN	47856	10	0
	~ MNT280010398	MINNEAPOLIS SERVICE SHOP	2025 49TH AVENUE N	MINNEAPOLIS	MN	55430	10 91	0
06	ARD007037823	SPECIALTY MOTOR DEPARTMENT	101 GEE STREET	JONESBORO	AR	72401	941	207
	LAD043197284		7000 FLOURNOY-LUCAS	SHREVEPORT	LA	71109		207 0
	LAD053782413		1115 DE ARMAS STREET	NEW ORLEANS	LA TX	70114	16 318	0
	TXD060718269		8800 WALLISVILLE RD	HOUSTON	TX	77029 75235	8	Ö
	TXD064114242		3202 MANOR WAY	DALLAS	TX	75235 77008	143	0
	TXD079400545		3530 W 12TH STREET	HOUSTON	TX KS	67005	14	ŏ
07	KSD041917501		STROTHER FIELD	ARKANSAS CITY			5	Ď
	MQD006312375		6251 ETZEL AVENUE	ST LOUIS	MO MO	63133	42	Ů
	MOD030709539		2401 SUNSHINE STREET		MO	65804	6	ů
08	COD062753702		4900 KINGSTON ST	DENVER	CO	80239	A	0
10	ORD001818442		2727 NW 29TH AVE	PORTLAND	OR	97210	31.0	0
	WAD009278706	AVIATION SERVICE DEPARTMENT	220 SOUTH DAWSON ST	SEATTLE	WA	98108		ů
	WAD046207379	SEATTLE SERVICE SHOP	1031 4TH AVENUE N	KENT	WA	98031	. 7	

3302.00000 (Tot PCLOSURE85)

^{17423.00000 (}Tot CLOSURE85)

REGION EPA ID DIFFREASON1 DIFFREASON2	
01 CTD000842500 FACILITY IS A GENERATOR UNLY	
MADDO1408491 PLANT OUT OF BUSINESS.	
MED051429579	
NHD000636134 FACILITY A GENERATOR ONLY.	
NHD001091073 FACILITY IS A GENERATOR ONLY.	
NHD001427475 FACILITY A GENERATOR ONLY. RID000652313 USED TO TEMP ID RIT450010004. GENERATOR ONLY	
RITUDOU652313 USED TO TEMP TO RITUSOUFF. GENERATOR ONE.	
VTD000649780 FACILITY IS A GENERATOR ONLY	
VTD000649848 FACILITY IS A GENERATOR ONLY	
02 NJD002454213 PLANT CLOSED	
NYOOOO521971 FACILITY IS A GENERATOR ONLY.	
NYDOD2084192 FACILITY IS A GENERATOR ONLY	
NYD002221919 PLANT SOLD TO BLACK AND DECKER	
NYDGO2247377 TSD FACILITY CLOSED.	
NYDO59385120 FACILITY IS A GENERATOR ONLY	
NYD990763203 TSD FACILITY CLOSED.	
PRD000634360 PLANT CLOSED	
PRODOCO732216 PLANT CLOSED	
PRO090037276 FACILITY IS A GENERATOR ONLY	
PRD090399973 PLANT CLOSED PRD090531104 FACILITY IS A GENERATOR ONLY	
PRT000041053 FACILITY IS A GENERATOR ONLY	
03 MDD078288354 FACILITY IS A GENERATOR ONLY.	
PAD001698786 FACILITY A GENERATOR ONLY. REQUESTED 6/83, APPROVED 3/85	
PADDO2316305 FACILITY IS A GENERATOR ONLY	
PADD435R3R48 FACILITY IS A GENERATOR ONLY	
PADD4655R037 FACILITY IS A GENERATOR ONLY	
PADD59282459 FACILITY IS A GENERATOR ONLY	
PAD069900124 FACILITY IS A GENERATOR ONLY	
PAD075527804 FACILITY IS A GENERATOR ONLY	
PADO82038480 FACILITY IS A GENERATOR ONLY	
VADO03132545 FACILITY IS A GENERATOR ONLY. VADO09708603 FACILITY IS A GENERATOR ONLY	
VADD49/08603 FACILITY IS A GENERATOR ONLY. PART A WITHDRAWAL APPROVED 9/84	
VADO46979019 GENERATOR ONLY. PLANT IS CLOSING 5/86.	
VAD980714638 FACILITY IS A GENERATOR ONLY	
4 ALDO78983301 FACILITY IS A GENERATOR ONLY	
KYDO80957495 FACILITY IS A GENERATOR ONLY.	
MST290010024 THE FACILITY IS CLOSED.	
NCD072018252 PLANT CLOSED	
NCD079044426 FACILITY IS A GENERATOR ONLY	
TNDOD4049979 FACILITY IS A GENERATOR ONLY.	
THOUSSASSES FACILITY IS A GENERATOR ONLY	
TND075470443 FACILITY IS A GENERATOR ONLY 05 ILD005453758 FACILITY IS A GENERATOR ONLY	•
05 ILD005453758 FACILITY IS A GENERATOR UNLY ILT180011512 CHANGED TO EPA ID NUMBER ILD980503023	
MID006407670 FACILITY IS A GENERATOR ONLY	
MUDAACITECAN FACTITTY TO A CENEDATAD ANIY	
MND006175590 FACILITY IS A GENERATOR ONLY OHD000817288 SINGLE FACILITY GIVEN 2 EPA ID NUMBERS. OTHER NUMBER IS THE NUMBER TH	AT IS USED.

	OHD004211462 OHD004303434 OHD004447694	FACILITY IS A GENERATOR ONLY FACILITY IS A GENERATOR ONLY
	OHD063971295 WID006121354	PLANT CLOSED
06	TXD000728923	FACILITY IS A GENERATOR ONLY. FACILITY USING OTHER FINANCIAL MECHANISM TO PROVIDE FINANCIAL ASSURANCE
09	TXD061382206 CAD009208091	PLANT CLOSED
	CAD041472341 CAD077193571	FACILITY IS A GENERATOR ONLY. FACILITY IS A GENERATOR ONLY.
	CAT000623983 WAD044592491	FACILITY IS A GENERATOR ONLY.
10	WAD052576923	FACILITY IS A GENERATOR ONLY.

EXPLANATIONS

				DIFFREASON3
REGION	EPA ID	DIFFREASON1	DIFFREASON2	DILLERADORS
01	CTD001453711 MA5570024617 MAD000791814 MAD001408475 MAD001408517 MAD053449393	CLOSURE PLAN AND ESTIMATES REVISED. CLOSURE PLAN AND ESTIMATES REVISED. PCLOSURE MA NOT TRACKED LAST YEAR NO CHANGE DUE TO ROUNDING NO CHANGE DUE TO ROUNDING MA NOT TRACKED LT YR. LANDFILL NOT IN RCRA PLAN ADJUSTED BY 1.1 TO AVOID ADJUST IN 86.	NUMBERS GENERATED	
02	VTD002083434 NJD003918570 NYD002080034	NJ ONLY ALLOWS USE OF THE FINANICAL TEST TO LIABILITY CLOSURE PLAN REVISED 10/3/85	TY COVERAGE	
	UV0053067006	NO CHANGE DUE TO ROUNDING ESTIMATED DECREASED BECAUSE IT DOES NO INCLUDE THE CLOSURE AND PCLOSURE ESTIMATES REVISED AND BASED OF	SMALL INSULATING PLANT. CURRENT DOLLARS.	
	PR0000692582	CLOSURE PLAN AND ESTIMATES REVISED. 10/3/85 CITY NAME WAS INCORRECTLY RECORDED. CLOSURE AND POS CLOSURE PLAN AND ESTIMATES REVISED.	ST CLOSURE REVISED	
03	PRD090306077 PRD090383860 PRD090492109 PRD090510793	CLOSURE PLAN AND ESTIMATES REVISED SITE UNDER CONSENT AGRMENT/REGION 2. SUBMITTED REV CLOSURE PLAN AND ESTIMATES REVISED. FACILITY WAS ERRONEOUSLY LEFT OFF THE LIST	. CLOSURE PLAN 7/85. AWAITING APPROVAL. LINE 3 REFLE	CTS UPDATED CL. COSTS
	PAD001680719 PAD005033055 PAD059290908 PAD060682622 PAD075527804 VAD003132255 VAD070360219	CLOSURE PLAN AND ESTIMATE REVISED		
04	VAD980551782 ALD980600035	WILL BE THE FIRST YEAR IN OPERATION	HW LANDFILL, CLOSE PONDS A & B, & SOLIDIFY SOLIDS I	N POND #4.
	GAD003308145 KYD006387021 KYD074047556 NCD003237948	CLOSURE PLAN AND ESTIMATES REVISED INCREASE CAUSED BY DISPOSAL OF INT WASTE THAT IS H CLOSURE PLAN AND ESTIMATES REVISED.		
	TND066709130	CLOSURE-ADD'L OPERATING UNITS WERE INCLUDED POST C CLOSURE PLAN AND ESTIMATES REVISED. CLSOURE PLAN AND ESTIMATES REVISED.	LOSURENO.OF WELLS TESTED AND AMT OF TEST REDUCED,	SO COSTS DECREASE

```
ILD005272992
05
       ILD005272992
       ILD005443866
       ILD005453691
                     NO CHANGE DUE TO ROUNDING
       ILD062338694
       TLD070015714
                     TEMPORARY EPA ID NUMBER ILT180011512
       ILD980503023
        IND000803726
                     NO CHANGE DUE TO ROUNDING
        IND004557815
                     NO CHANGE DUE TO ROUNDING.
       IND005422084
        IND005448683
                     NO CHANGE DUE TO ROUNDING
        IND006040299
        IND006376362
                     NO CHANGE DUE TO ROUNDING
        IND006392773
                     NO CHANGE DUE TO ROUNDING
        MID044254423
                     NO CHANGE DUE TO ROUNDING
        MID050616622
                     NO CHANGE DUE TO ROUNDING
        MNT280010398
                      NO CHANGE DUE TO ROUNDING
        OHD000721456
                      NO CHANGE DUE TO ROUNDING
                      84 AMT OF $51K IS INCORRECT DUE TO AN ADDITION ERROR. SHOULD HAVE BEEN $50K MAKING THE 85 AMT OF $52 CORRECT.
        OHD000817304
        OHD060817312
        OHD004176046
        OHD004224960
        OHD004226171
        OHD004227369
        OHD004302428
        OHD009101494 NO CHANGE DUE TO ROUNDING
        OHD048111090
        OHD048432975
        OHD048433080
        OH0059061317
        OHD066052804 CLOSURE COST INCREASED BECAUSE THEY INCLUDE THE CLOSURE OF NEW TREATMENT PROCESS
                      CHANGE OF STATUS TO GENERATOR IS IMMINENT
        DHD074713561
        OHD085240133
        WID000808725
        WID006121347
        WID086686003
        WID980683569
        ARD007037823 CLOSURE PLAN AND ESTIMATES REVISED.
        LAD043197284
        LAD053782413
        TXD060718269 THIS FACILITY IS CLASS I NON-HAZARDOUS STORAGE AND TRANSFER FACILITY
        TXD064114242
         TXD079400545
        IADOGO678037 CLOSURE PLAN AND ESTIMATES REVISED. ERRONEOUSLY OMITTED LAST YEAR
 07
         IADO05272703 CLOSURE PLAN AND ESTIMATES REVISED.
         IAD075836130 NO CHANGE DUE TO ROUNDING
         KSD041917501
         KSD041917501
         HODO06312375 CLOSURE PLAN AND ESTIMATES REVISED.
         MOD030709539 CLOSURE PLAN AND ESTIMATES REVISED
         COD062753702 NO CHANGE DUE TO ROUNDING
         CADOGGB19680 CLOSURE PLAN AND ESTIMATES REVISED.
 09
         CADO09208075 NO CHANGE DUE TO ROUNDING
        CADO09542721 CLOSURE PLAN AND ESTIMATES REVISED.
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CAT000611095	CLOSURE PLAN AND ESTIMATES REVISED.			
CAT000613471 ORD001818442 WAD009278706 WAD046207379	THE THE HOLD COUNTY AT PLANT 1.	84 AMT WAS FOR PLANTS 1 & 2.	PLANT 2 IS AND ALWAYS	WAS A GENERATOR ONLY.

10



Peat, Marwick, Mitchell & Co. Certified Public Accountants Stamford Square 3001 Summer Street Stamford, Connecticut 06905 203-356-9800

March 27, 1986

Mr. Dennis D. Dammerman Senior Vice President - Finance General Electric Company 3135 Easton Turnpike Fairfield, Connecticut 06431

Dear Mr. Dammerman:

At your request, we have performed the procedures enumerated below with respect to Part B of your certificate, dated March 27, 1986, to the Environmental Protection Agency. These procedures were performed solely to assist you in connection with the filing of the above mentioned certificate, and our report is not to be used for any other purpose. The procedures we performed are summarized as follows:

- o The dollar amount of tangible net worth included under item 7, Part B, certificate page 2 We compared the dollar amount of tangible net worth, which represents total shareowners' equity less goodwill and licenses and other intangible costs included in other assets, with the balance of total shareowners' equity included in the Company's 1985 Annual Report less the sum of goodwill and licenses and other intangible costs included in note 15 (other assets) on page 44 of the Company's 1985 Annual Report and found them to be in agreement.
- o The dollar amount of total assets in the U.S. included under item 8, Part B, certificate page 2 We compared the dollar amount of total assets in the U.S. with the balance of United States assets included in the Geographic segment information on page 50 of the Company's 1985 Annual Report and found them to be in agreement.
- o To determine that the negative response to item 11, Part B, certificate page 2 was correct, we compared the amount of U.S. assets included under item 8, Part B with the product of 90% times total assets as shown on the "Statement of Financial Position" page 28 of the Company's 1985 Annual Report and found that the amount under item 8 was less than the result of the computation described above.

GENERAL 🍪 ELECTRIC

Letter from Chief Financial Officer to Demonstrate Both Liability Coverage and Assurance of Closure or Post-Closure Care .

March 27, 1986

Director, Ohio Environmental Protection Agency State of Ohio Environmental Protection Agency 361 E. Broad Street Columbus, OH 43216-1049

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of this firm's use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code: See Schedule I

- 1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure is demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Schedule II
- 2. This firm guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure or post-closure care of the following facilities which are owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None
- 3. In States where U.S. EPA or a state so authorized is administrating the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Schedules III and IV
- 4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to Ohio EPA through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 and 3745-66 of the Administrative Code or equivalent or substantilly equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

GENERAL & ELECTRIC

Page Two

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

		(Dollars in thousands)
1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$46,076
2.	Amount of annual aggregate liability coverage to be demonstrated	\$8,000_
3.	Sum of lines 1 and 2	\$ 54,076
4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moody's AAA - Standard & Poor's
5.	Date of issuance of bond	May 1974
6.	Date of maturity of bond	May 2004
* 7.	Tangible net worth (if any portion of the closur or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	
* 8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 22,733,000 YES NO
9.	Is line 7 at least \$10 million?	<u>x</u>
10.	Is line 7 at least 6 times line 3?	<u>x</u>
11.	Are at least 90% of assets located in the U.S.? If not, complete line 12	<u> x</u>
12.	Is line 8 at least 6 times line 3?	<u>x</u>

I hereby certify that the wording of this letter is identical to the wording specified in Paragraph (G) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.

GENERAL 🍪 ELECTRIC

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Dennis D. Dammerman Senior Vice President-Finance March 27, 1986

	CLOSURE		POST-CLOSURE
SCHEDULE II	2056		0
SCHEDULE III	1278		0
SCHEDULE IV	31726		11016
*******	:======================================	:=======	:======================================
TOTAL	35060		11016
GRAND TOTAL FOR CLOSURE AND/OR POST-CLO	OSURE	4 6076	
•			

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SCHEDULE I

PECTON	EDA TO	LGCATION	STREET	CITY	STATE	ZIP
REGION	<u>EPA ID</u>			OLATABITI I E	CT	06062
_,	CTD000842492	DISTRIBUTION EQUIPMENT DIV.	SENT ST.	PLAINVILLE	CŤ	06602
01	CTD001453711	BRIDGEPORT AREA RELATIONS OPR.	1285 BOSTON AVENUE	BRIDGEPORT	ME	04210
	MED051431906	DISTR EQMT - CIRCUIT PROT	RODMAN ROAD	AUBURN	VT	05401
	MEDIO1431300	ARMAMENT SYSTEMS DEPT	LAKESIDE AVENUE	BURLINGTON	NJ.	67047
	VTD002083434 NJD003918570	NEW YORK SERVICE SHOP	6001 TONNELLE AVENUE	NORTH BERGEN	MY	14843
02		SILICONE PRODS DIV	260 HUDSON RIVER RD	WATERFORD	NY	12839
	NYD002080034	CAPACITOR TRADS DPT	8 JOHN STREET	HUDSON FALLS		12345
	NYD002080075	SCHENECTADY UTILITIES OF	1 RIVER ROAD	SCHENECTADY	NY	
	NYD002084135	SEMICONDUCTOR PRODS DPT	W GENESEE ST. ROAD	AUBURN	NY	13021
	NYD002231272	AERO CONTROL SYS DPT	600 MAIN STREET	JOHNSON CITY	NY	13790
	NYD002235182	ELECTROMATERIALS BUS DEPT	1 CAMPBELL ROAD	SCHENECTADY	NY	12345
	NYD052987096	NORYL PRODUCTS DIVISION	NORYL AVENUE	SELKIRK	NY	12158
	NYD066832023	BUFFALO SERVICE SHOP	175 MILLENS ROAD	TONAHANDA	NY	14150
	NYD067539940		RIVER ROAD	NISKAYUNA	NY	12309
	NYD071094197	CORPORATE R&D	7325 BROADHAY	FORT EDWARD	NY	12828
	MYD093256063	CAPACITOR PRODS DPT	ROUTE 993 BARRIO	VIEQUES	PR	00765
	PRD000692582	CARIBE GENERAL ELECTRIC PROD	LA BRISA NO 5	RIO PIEDRAS	PR	00924
	PR0000692590	CARIBE GENERAL ELECTRIC PROD	STATE RD 3 K 82	HUMACAO	PR	00762
	PRD090070459	CARIBE GENERAL ELECTRIC PROD	KM 67 CARRETARA 149	JUANA DIAZ	PR	00665
	PRD090282757	CARIBE GENERAL ELECTRIC PROD	EL TUQUE INDT PARK	PONCE	PR	00731
	PRD090306077	CARIBE GENERAL ELECTRIC PROD	RT 129, KH41	ARECIBO	PR	00612
	PR0090383860	CARIBE GENERAL ELECTRIC PROD	P.O. 80X 968	PATILLAS	PR	00723
	PRD090492109	CARIBE GENERAL ELECTRIC PROD	ROUTE 191 KM 5	PALMER	PR	00721
	PR0090510793	CARIBE GENERAL ELECTRIC PROD	EL RETIRO IND PRK	SAN GERMAN	PR	00745
	PRD091019224	CARIBE GENERAL ELECTRIC PROD	APPLIANCE PARK EAST	COLUMBIA	HO	21045
03	MDD046279311	COLUMBIA R & U OPERATION		KING OF PRUSSIA	PA	19406
••	PAD001680719	SPACE DIV-VALLEY FORGE	230 GODDARD BLVD.	ERIE	PA	16531
	PAD005033055	TRANS SYST BUS OPS	2901 EAST LAKE ROAD	GROVE CITY	PA	18127
	PAD059290908	TRANS SYS BUS OPS	INDUSTRIAL DRIVE	BRIDGEVILLE	PA	15017
	PAD060682622	BRIDGEVILLE GLASS PLANT	MAYER STREET		VÄ	24502
	VAD003132255	MOBILE COMM BUS DPT	MOUNTAIN VIEW ROAD	LYNCHBURG	VA	22601
	VAD070360219	LITHCHESTER LAMP PLANT	ROUTE 3 BOX 310	WINCHESTER	• • •	22901
	VAD980551782	INDUSTRIAL CONTROL DEPARTMENT	ROUTE 29N AT TR 6066	CHARLOTTESVILLE	AL	36725
	ALD980600035	PLASTICS BUSINESS OP	ROUTE 1 BOX 21	BURKVILLE	FL	32105
04	FLD001690924	SIMULATION & CHTL SYS DPT	1800 VOLUSIA AVENUE	DAYTONA	FL	12602
	FLD043860451	BATTERY BUS DPT	HIGHWAY 441 NORTH	GAINESVILLE	GA	30161
	GAD003308145	HEDIUM TRANSFORMER DPT	REDMOND CIRCLE	ROME	KY	42301
	KYD006387021	MA MANUFACTURING DIV	APPLIANCE PARK BLDG	LOUISVILLE	-	42431
	KYD074047556		US HIGHWAY 41A	MADISONVILLE	KY	28603
	NCD003237948	The second second	FAIRGROVE CHURCH RD	HICKORY	NC NC	28481
	NCD050409150	in min min month of the con-	CASTLE HAYNE	WILMINGTON	NC	_
			3001 W RADIO DRIVE	FLORENCE	SC	29501
	SCB067002147		EAST MORRIS BLVD	MORRISTOWN	TN	37814
	TND066709130	COLT OTI	S 4TH STREET	SELMER	TN	38375
	TND078565249		709 WEST WALL STREET	MORRISON	IL	60644
05	ILD005272992	·	1501 S 19TH STREET	MATTON	IL	61938
	ILD005443866	THE PROPERTY OF THE PROPERTY O	VETERANS PARKWAY	BLOOMINGTON	IL	61701
	ILD005453691	TO THE PARTY OF A PARTY OF THE	7555 EAST COLLINS RD	MORRIS	IL	60450
	ILD062338694	SAFAT LAFT SERVICE CHUB	6045 S NOTTINGHAM AV	CHICAGO	IL	60638
	ILD070015714		1540 S 54TH	CICERO	IL.	60 650
	ILD980503023	MAJOR APPLIANCE	301 NORTH CURRY PIKE		IN	47402
	IND000803726	MA MANUFACTURING DIV	SAI MARIN FARMI 1940			

REGION	EPA ID	LOCATION	STREET	CITY	STATE	<u>ZIP</u>
NEWS WILL	<u> </u>		1701 COLLEGE STREET	FORT WAYNE	IN	46804
	IND004557815	SPECIALTY TRANSF DPT	500 NORTH 9TH STREET	DECATUR	IN	46733
	IND005422084	GENL PURPOSE MOTOR DPT	2000 TAYLOR STREET	FORT WAYNE	IN	46804
	IND005448683	GENL PURPOSE MOTOR DPT	TWELFTH STREET SE	LINTON	IN	46804
	INDD06040299	GENERAL PURPOSE MTR DEPT	LEXAN LANE	MOUNT VERNON	IN	47620
	IND006376362	LEXAN PRODUCTS DIVISION SPECIALTY MOTOR DEPT	13TH & PAYNE STREETS	TELL CITY	IN	47856
	IND006392773	CARBOLOY SYSTEMS DPT	11177 E 8 MILE ROAD	WARREN	MI	48089
	MID044254423	DETROIT SERVICE SHOP	18704 KRAUSE STREET	RIVERVIEW	MI	48192
	MID050616622	MINNEAPOLIS SERVICE SHOP	2025 49TH AVENUE N	MINNEAPOLIS	MN	55430
25 24 22	MNT280010398	AVIATION SERVICE DEPARTMENT	3024 SYMMES ROAD	HAMILTON	OH	45015
25 31 37	DHD000721456	AVIATION SERVICE DEPARTMENT	1350 TENNESSEE AVE	CINCINNATI	OH	45229
-3-31-51-51-51-51-51-51-51-51-51-51-51-51-51	∑0HD000817312	AEBG	175 NEUMANN WAY	EVENDALE	OH	45215
د مست ط " الدارية . 20 ماري = 72 ماري	_OHD004176046	NILES GLASS PLANT	403 N MAIN STREET	NILES	OH	44446
02-14-515	T OHD004224960	TRUMBULL LAMP PLANT	1313 W MARKET STREET	WARREN	OH	44485
ع التا التا	OHD004226171	YOUNGSTOWN LAMP PLANT	40 HUGHES STREET	YOUNGSTOWN	OH	44502
02-18-01-1	OHD004227369	REFR METALS PROD DPT	21800 TUNGSTEN ROAD	EUCLID	OH	44117 43812
	 £0H0004302428	FLECTROMATERIALS BUS DEPT	1350 S SECOND STREET	COSHOCTON	OH OH	45216
15-31-037	SOHD009101494	AVIATION SERVICE DEPARTMENT	333 W SEYMOUR AVE	CINCINNATI	OH	44047
12-04-146	DHD048111090	JEFFERSON WELD PLANT	85 W ASTUBULA	JEFFERSON	OH	44110
02-18-013	OHD048432975	LIGHTING REL & OPS	1122 E 152ND STREET	CLEVELAND	OH	44110
02-16-016	7 OHD048433080	CHEMICAL PRODUCTS PLANT	1099 IVANHOE ROAD	CLEVELAND RAVENNA	OH	44110
02-67-015	8 онооброб1317	RAVENNA LAMP PLANT	6880 N CHESTNUT ST	WARREN	OH	45660
02-78-05	OHD066052804	OHIO LAMP- WARREN	1210 N PARK AVENUE	CINCINNATI	OH	45246
	_OHD074713561	CINCINNATI SERVICE SHOP	156 CIRCLE FREEWAY	E CLEVELAND	OH -	44112
22-18-0165	OHD085240133	NELA PARK FACILITY	NELA PARK, NOBEL RD	JONESBORO	AR	72401
06	ARD007037823	SPECIALTY MOTOR DEPARTMENT	101 GEE STREET 7000 FLOURNOY-LUCAS	SHREVEPORT	LA	71109
	LAD043197284	DISTR TRANS BUS DPT	1115 DE ARMAS STREET	NEW ORLEANS	LA	70114
	LAD053782413	NEW ORLEANS SERVICE SHOP	8800 WALLISVILLE RD	HOUSTON	TX	77029
	TXD060718269	HOUSTON SERVICE SHOP	3202 MANOR WAY	DALLAS	TX	75235
	TX0064114242	DALLAS SERVICE SHOP	3530 W 12TH STREET	HOUSTON	ΤX	77008
	TXD079400545	DISTRIBUTION EQUIPMENT DIV.	1404/18 W MT PLEASAN	W BURLINGTON	IA	52655
07	IAD000678037	POWER DELIVERY	510 AGENCY ROAD	W BURLINGTON	IA	51401
	IAD005272703		1803 RADIANTNCY	CARROLL	IA	51401
	IAD075836130	AVIATION SERVICE DEPARTMENT	STROTHER FIELD	ARKANSAS CITY	KS	67005
	KSD041917501		6251 ETZEL AVENUE	ST LOUIS	HO	63133
	MOD006312375	THE PARTY OF THE P	2401 SUNSHINE STREET	SPRINGFIELD	MO	65804
	MOD030709539		4900 KINGSTON ST	DENVER	CO	80239
08	COD062753702 CAD000819680		3920 SECURITY PARK	RANCHO CORDOVA	CA	95670
09	CAD009208075	THE PARTY OF THE P	5441 E 14TH STREET	OAKLAND	CA	94601
	CAD00920073	THE PARTY OF THE P	ONTARIO INTL AIRPORT	ONTARIO	CA	91761
	CAD030584502		3601 E LA PALMA ST	ANAHEIM	CA	92806
	CAD053914206		6705 VALLECITOS RD	SUNOL	CA	94566 91710
	CAD980818512	AEBG ASO/ONTARIO-CHINO	13477 YORBA	CHINO	CA	91605
	CAT000611095	DISTRIBUTION EQUIPMENT DIV	11115 VANOWEN ST	N HOLLYWOOD	CA	95125
	CAT000613471	NUCLEAR ENERGY REL & UTIL	175 CURTNER	SAN JOSE	CA	97210
10	ORD001818442	PORTLAND SERVICE SHOP	2727 NH 29TH AVE	PORTLAND	OR WA	98108
, .	WAD009278706	AVIATION SERVICE DEPARTMENT	220 SOUTH DAWSON ST	SEATTLE	WA WA	98031
	WAD046207379		1031 4TH AVENUE N	KENT	MA	2043 (

SCHEDULE II

	504 Y6	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
REGION 05	OHD000817304 OHD000817312 OHD004176046 OHD004224960 OHD004226171 OHD004227369 OHD004302428 OHD009101494	AVIATION SERVICE DEPARTMENT AVIATION SERVICE DEPARTMENT AEBG NILES GLASS PLANT TRUMBULL LAMP PLANT YOUNGSTOWN LAMP PLANT REFR METALS PROD DPT ELECTROMATERIALS BUS DEPT AVIATION SERVICE DEPARTMENT JEFFERSON WELD PLANT LIGHTING REL & OPS CHEMICAL PRODUCTS PLANT RAVENNA LAMP PLANT OHIO LAMP- WARREN CINCINNATI SERVICE SHOP	3024 SYMMES ROAD 1350 TENNESSEE AVE 175 NEUMANN WAY 403 N MAIN STREET 1313 W MARKET STREET 40 HUGHES STREET 21800 TUNGSTEN ROAD 1350 S SECOND STREET 333 W SEYMOUR AVE 85 W ASTUBULA 1122 E 152ND STREET 1099 IVANHOE ROAD 6880 N CHESTNUT ST 1210 N PARK AVENUE 156 CIRCLE FREEWAY NELA PARK, NOBEL RD	HAMILTON CINCINNATI EVENDALE NILES WARREN YOUNGSTOWN EUCLID COSHOCTON CINCINNATI JEFFERSON CLEVELAND RAVENNA WARREN CINCINNATI E CLEVELAND	OH OH OH OH OH OH OH OH	45015 45229 45215 44446 44485 44502 44117 43812 45216 44047 44110 44110 44110 45246 44112	1 1 52 38 16 51 148 104 2 19 347 983 22 81 9	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

2056.00000 (Tot CLOSURE85)

SCHEDULE III

REGION	EPA ID	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
02	PR0090492109	CARIBE GENERAL ELECTRIC PROD	ROUTE 993 BARRIO LA BRISA NO 5 STATE RD 3 K 82 KM 67 CARRETARA 149 EL TUQUE INDT PARK RT 129, KM41 P.O. BOX 968 ROUTE 191 KM 5 EL RETIRO IND PRK	VIEQUES RIO PIEDRAS HUMACAO JUANA DIAZ PONCE ARECIBO PATILLAS PALMER SAN GERMAN	PR PR PR PR PR PR PR PR	00765 00924 00762 00665 00731 00612 00723 00721	38 21 115 42 3 65 154 830	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

1278.00000 (Tot CLOSURE85)

SCHEDULE IV

			-		STATE	<u> 21P</u>	CLOSURE85	PCLOSURE85
DECTON	EPA ID	LOCATION	STREET	CITY	TIVIE	201		_
REGION	FLU YE		CENT ST	PLAINVILLE	CT	06062	1032	0
01	CTD000842492	DISTRIBUTION EQUIPMENT DIV.	SENT ST. 1285 BOSTON AVENUE	BRIDGEPORT	CT	06602	195	480
01	CTD001453711	BRIDGEPORT AREA RELATIONS OPR.	1782 BOSTON MARKOT	AUBURN	ME	04210	17	0
	MED051431906	DISTR FOMT - CIRCUIT PROT	RODMAN ROAD LAKESIDE AVENUE	BURLINGTON	VT	05401	77	0
	VTD002083434	ADMAMENT SYSTEMS DEPT	260 HUDSON RIVER RD	WATERFORD	NY	14843	9830	3394
02	NYD002080034	STLICONE PRODS DIV	8 JOHN STREET	HUDSON FALLS	NY	12839	215	0
01	NYD002080075	CAPACITOR TRADS DPT	1 RIVER ROAD	SCHENECTADY	NY	12345	319	0
	NYD002084135	SCHENECTADY UTILITIES OF	W GENESEE ST. ROAD	AUBURN	NY	13021	127	0
	NYD002231272	SEMICONDUCTOR PRODS DPT	600 MAIN STREET	JOHNSON CITY	NY	13790	6	0
	NYD002235182	AERO CONTROL SYS DPT	1 CAMPBELL ROAD	SCHENECTADY	NY	12345	242	3840
	NYD052987096	ELECTROMATERIALS BUS DEPT	NORYL AVENUE	SELKIRK	NY	12158	441	
	NYD066832023	HORYL PRODUCTS DIVISION	175 MILLENS ROAD	TONAWANDA	NY	14150	103	0
	NYD067539940	BUFFALO SERVICE SHOP	RIVER ROAD	NISKAYUNA	NY	12309	160	0
	NYD071094197	CORPORATE R&D	7325 BROADWAY	FORT EDWARD	NY	12828	451	187
	NYD093256063	CAPACITOR PRODS DPT	APPLIANCE PARK EAST	COLUMBIA	MD	21045	130	
	MDD046279311	COLUMBIA R & U OPERATION	230 GODDARD BLVD.	KING OF PRUSSIA	PA	19406	66	0
	PAD001680719	SPACE DIV-VALLEY FORGE	2901 EAST LAKE ROAD	ERIE	PA	16531	84	184
	PAD005033055	TRANS SYST BUS OPS	INDUSTRIAL DRIVE	GROVE CITY	PA	18127	65	0
	PAD059290908	TRANS SYS BUS OPS	MAYER STREET	BRIDGEVILLE	PA	15017	506	0
	040060682627	RPINGEVILLE GLASS PLAN!	MOUNTAIN VIEW ROAD	LYNCHBURG	VA	24502	40	0
*	VAD003132255	MOBILE COMM BUS DPT	ROUTE 3 BOX 310	WINCHESTER	VA	22601	28	0
	VAD070360219	LITACHESTER LAMP PLANT	ROUTE 29N AT TR 6066	CHARLOTTESVILLE	VA	22901	51	0
	VAD980551782	INDUSTRIAL CONTROL DEPARTMENT	ROUTE 1 BOX 21	BURKVILLE	AL	36725	40	0
04	ALD980600035	PLASTICS BUSINESS OF	1800 VOLUSIA AVENUE	DAYTONA	FL	32105	97	0
4	FLD001690924	SIMULATION & CNTL SYS OPI	HIGHWAY 441 NORTH	GAINESVILLE	FL	32602	6171	1309
	FLD043860451	BATTERY BUS DPT		ROME	GA	30161	200	0
	GAD003308145	MEDIUM TRANSFORMER DPT	REDMOND CIRCLE APPLIANCE PARK BLDG	LOUISVILLE	KY	42301	144	0
	KYD006387021		US HIGHWAY 41A	MADISONVILLE	KY	42431	40	0
	KYD074047556	AEBG	FAIRGROVE CHURCH RD	HICKORY	NC	28603	70	344
	NCD003237948	DIST TRANS BUS UP1	CASTLE HAYNE	WILMINGTON	NC	28401	79	0
	NCD050409150	MUCLEAR ENERGY BUS UP	3001 W RADIO DRIVE	FLORENCE	SC	29501	2933	507
	SCD067802147	MOBILE COMM BUS DIV	3001 M KADIO DETAL	MORRISTOHN	TN	37814	660	0
	TND066709130	DISTRIBUTION EQMI DIV	EAST MORRIS BLVD	SELMER	TN	38375	373	0
	TND078565249	NTSTOTAUTION EOMT DIV	S 4TH STREET 709 WEST WALL STREET		IL	60644	10	Ō
05	ILD005272992	APPLIANCE CONTROL DPT	1501 S 19TH STREET	MATTON	IL	61938	19	0
0.5	ILD005443866	MATTON LAMP PLANT	VETERANS PARKWAY	BLOOMINGTON	IL	61701	33	0
	ILD005453691	CENEDAL PURPOSE CUNTRUL DEPT	7555 EAST COLLINS RD		IL	60450	3	٥
	ILD062338694	SPENT FUEL SERVICE OPERATION	6045 S NOTTINGHAM AV		IL	60638	8	0
	ILD070015714	CHICAGO SERVICE SHOP	1540 S 54TH	CICERO	IL	60650	33	0
	ILD980503023	MAJOR APPLIANCE	30) NORTH CURRY PIKE		IN	47402	72	0
	IND000803726	. MA MANUFACTURING UIV	1701 COLLEGE STREET	FORT WAYNE	IN	46804	5	0
	IND004557815	S SPECIALTY TRANSF DPT	1/UI CULLEGE SIREE!		IN	46733	6	0
	IND005422084	L GENL PURPOSE MOTOR DPT	500 NORTH 9TH STREET	FORT WAYNE	IN	46804	20	0
	IND00544868	GENI PURPOSE MOTOR DPT	2000 TAYLOR STREET	LINTON	IN	46804	9	0
	IND006040299	GENERAL PURPOSE MTR DEPT	TWELFTH STREET SE	MOUNT VERNON	IN	47620	3640	564
	IND00637636	2 LEXAN PRODUCTS DIVISION	LEXAN LANE	TELL CITY	IN	47856	10	0
	IND00639277	3 SPECIALTY MOTOR DEPT	13TH & PAYNE STREETS	WARREN	ΜI	48089	7	Ģ
	MID04425442	3 CARBOLOY SYSTEMS DPT	11177 E 8 MILE ROAD	RIVERVIEW	ΜĪ	48192	5	0
	MID05061662	2 DETROIT SERVICE SHOP	18704 KRAUSE STREET	MINNEAPOLIS	MN	55430	10	0
	HNT28001039		2025 49TH AVENUE N	UTMUTVLAFFA				

REGION	EPA_ID	LOCATION	STREET	CITY	STATE	ZIP	CLOSURE85	PCLOSURE85
06 07 08 07	ARD007037823 LAD043197284 LAD053782413 TXD060718269 TXD064114242 TXD079400545 IAD000678037 IAD005272703 IAD075836130 KSD041917501 MOD006312375 MOD030709539 COD062753702 CAD000819680 CAD009208075 CAD030584502 CAD033914206 CAD980818512	SPECIALTY MOTOR DEPARTMENT DISTR TRANS BUS DPT NEW ORLEANS SERVICE SHOP HOUSTON SERVICE SHOP DALLAS SERVICE SHOP OISTRIBUTION EQUIPMENT DIV. POWER DELIVERY SWITCHGEAR BUSINESS DEPT APPLIANCE CONTROL DEPARTMENT AVIATION SERVICE DEPARTMENT ST LOUIS LAMP PLANT SPECIALTY MOTOR DEPARTMENT DENVER SERVICE SHOP MEDICAL SYSTEMS BUSINESS OPS SAN FRANCISCO SERVICE SHOP AVIATION SERVICE DEPARTMENT LA SERVICE SHOP NUCLEAR ENERGY REL & UTIL AEBG ASO/ONTARIO-CHINO DISTRIBUTION EQUIPMENT DIV NUCLEAR ENERGY REL & UTIL PORTLAND SERVICE SHOP	STREET 101 GEE STREET 7000 FLOURNOY-LUCAS 1115 DE ARMAS STREET 8800 WALLISVILLE RD 3202 MANOR WAY 3530 W 12TH STREET 1404/18 W MT PLEASAN 510 AGENCY ROAD 1803 RADIANTNCY STROTHER FIELD 6251 ETZEL AVENUE 2401 SUNSHINE STREET 4900 KINGSTON ST 3920 SECURITY PARK 5441 E 14TH STREET ONTARIO INTL AIRPORT 3601 E LA PALMA ST 6705 VALLECITOS RD 13477 YORBA 11115 VANOWEN ST 175 CURTNER 2727 NW 29TH AVE 220 SOUTH DAWSON ST	JONESBORD SHREVEPORT NEW ORLEANS HOUSTON DALLAS HOUSTON W BURLINGTON W BURLINGTON CARROLL ARKANSAS CITY ST LOUIS SPRINGFIELD DENVER RANCHO CORDOVA OAKLAND ONTARIO ANAHEIM SUNOL CHINO N HOLLYWOOD SAN JOSE PORTLAND SEATTLE	AR LA TX TX IAA IAA KS MO CCA CCA CCA CCA CCA CCA CCA CCA CCA CC	72401 71109 70114 77029 75235 77008 52655 51401 51401 67005 63133 65804 80239 95670 94601 91761 92806 94566 91710 91605 951125 97210 98108	91 941 16 318 8 143 150 93 8 14 5 42 6 25 5 21 16 69 8 19 699 8	0 207 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
	WAD046207379		1031 4TH AVENUE N	KENT	WA	98031	7	11016.00000 (Tot PCLOSURE85)

31726.00000 (Tot CLOSURE85)

Statement of Fina sial Responsibility

The financial information in this Report, including the audited financial statements, has been prepared by General Electric management. Preparation of these statements and data involves estimates and the use of judgment. Accounting principles underlying the financial statements are generally accepted in the United States and are consistent with standards issued by the International Accounting Standards Committee. However, in a few important instances, which are commented on an note 1 on page 38, there is no single specified accounting principle or standard. Where management makes a choice from reasonable, accepted alternatives, it was methods which it believes are prudent for GE.

To safeguard share owner assets, it is important to have a sound but dynamic system of internal financial controls and procedures which balances benefits and costs. One of the key elements of GE's internal financial controls has been the Company's success in recruiting, selecting, training and developing professional financial managers. Their responsibilities include implementing and overseeing the financial control system, reporting management's stewardship of the assets entrusted to it by share owners, and accumite and proper maintenance of the accounts.

Management has long recognized its responsibility for conducting the Company's affairs in an ethical and socially responsible manner. The commitment to this responsibility is reflected in key written policy statements. These cover, among other subjects, potentially conflicting outside business interests of employees, compliance with antitrust laws and proper domestic and international business practices. General Electric's intention to maintain the

highest standards of conduct and practices with respect to transactions with the United States government was reaffirmed in a written policy in 1985. This policy and related vigorous actions emphasize to all employees that even the appearance of impropriety can erode public confidence in the Company and in the government procurement process. Ongoing education, communication and review programs are designed to create a strong compliance environment and to make it clearly understood that deviation from Company policies will not be tolerated.

Peat, Marwick, Mitchell & Co. provide an objective, independent review of management's discharge of its obligations relating to the fairness of reported operating results and financial condition. Their report for 1985 again took no exceptions to the Company's financial statements.

The Audit Committee of the Board (consisting solely of Directors from outside GE) maintains an ongoing appraisal, on behalf of share owners, of the effectiveness of the independent public accountants, the Company's staff of corporate auditors and GE management, with respect to preparation of financial statements, and of the adequacy of internal financial controls. The committee also reviews the Company's accounting policies, internal accounting controls, and the Annual Report and proxy material.

Warie Warmen

Dennis D. Dammerman Senior Vice President Famance

Pebruary 14, 1986

John F. Welch, Jr.

Chairman of the Board and
Chief Executive Officer

Report of Independent Certified Public Accountants

Jan Para Para Santa Chamberra

The production of the producti

In our opinion, the aforementioned financial statements appearing on pages 26, 28, 30 and 38-51 present fairly the financial position of General Electric Company and consolidated affiliates at December 31, 1985 and 1984, and the results of their operations and the changes in their financial position for each of the years in the three-year period ended December 31, 1985, in conformity with generally accepted accounting principles applied on a consistent basis.

At Mind Wilder G.

Pest, Marwick, Mitchell & Co. 345 Park Avenue, New York, N.Y. 10154

Telegraphy (Telegraphy)



CORPORATE

ACCOUNTING

GENERAL ELECTRIC COMPANY...... FAIRFIELD, CONNECTICUT 06431

SERVICES

January 13, 1983

ADDITIONAL INFORMATION IS FILED WITH 04D 004 226 191

Regional Administrators United States Environmental Protection Agency

The General Electric Company submitted its demonstration of Financial Responsibility for Liability Coverage and Closure and/or Post Closure Care for its hazardous waste facilities on June 28, 1982. Attached are amended documents which reflect non sudden accident liability coverage as well as some changes in sites covered and minor revisions to cost estimates. These changes do not affect the results of the financial test mechanism.

Very truly yours,

S. D. Spencer

Consultant - External Financial

Information

SDS:avs

Attachment

RECEIVED

JAN 181983

WASTE MANAGEMENT BRANCH EPA, REGION V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-TUB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jim Magella General Electric Company 6800 North Chestnut Street Ravenna, Ohio 44266

RE: General Electric Co. OHD059061317

Dear Mr. Magella:

The referenced company is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such facilities shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and proof of liability coverage by July 15, 1982 (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of the requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities ATTN: Financial requirements P.O. Box A3587 Chicago, Il 60690

Mr. Thomas B. Golz, at (312) 886-4023, can provide additional information concerning this notice.

Sincerely,

William H. Miner, Chief

Technical, Permits, and Compliance Section

cc: Tegtmeyer = OEPA



OCT 12 1989

5HR-12

Mr. James Magella General Electric Company Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44667

Re: Return to Compliance

General Electric Company

Ravenna Lamp Plant OHD 059 061 317

Dear Mr. Magella:

We have received and reviewed your letter of September 28, 1989, regarding our Notice of Violation (NOV) dated May 17, 1989.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulations found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV.

If you should have any further questions, please contact Mr. Gregory Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief IN/MN/OH Enforcement Program Section

cc: Mike Savage, OEPA

Andrea Dakoski, NEDO

bcc: Sally Swanson, REB diskette #2 magella

RCRA ENFORCE- MENT

INIT. DATE

REB SECTION CHIEF

CHIEF

REB SECTION CHIEF

CHIEF

CHIEF

CHIEF

CHIEF

CHIEF

CHIEF



Discharge Production Department Ravenna Lamp Plant General Electric Company 6800 N. Chestnut St., Ravenna, OH 44266 216 297-0861

September 28, 1989

Gregory Carlson
U.S. E.P.A. Region 5
230 South Dearborn St.
Chicago, Illinois 60604

Re: Response to Notice of Violation

The information provided is the updated waste analysis plan for the Ravenna Lamp Plant as required under 40 CFR Part 268. Included in the plan is the information needed to comply with the new "Land Band Restrictions" in the areas of testing, notification and recordkeeping.

This information should meet the requirements that the agency feels that we were not in compliance with at the time of our inspection on January 23, 1989. If there should be any questions, please call me at (216) 297-0861.

Jim Magella

JM:sh 6079F



- 1. UPDATE WASTE ANALYSIS PLAN
- 2. SHIPMENT PAPER FOR RESTRICTED SHIPMENT
- 3. COMPLIANCE LETTER FROM OEPA JULY 7, 1989

Official

Re: DHMM

DHMM Ravenna General Electric - Lamp Plant

STATUS 5

Portage County #02-67-0158

G/TSD

019059 061 317

General Electric - Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266

Attn: Jim Magella

Dear Sir:

July 11, 1983

On June 10, 1983, I conducted a hazardous waste inspection of the General Electric - Ravenna Lamp Plant located at 6800 N. Chestnut Street in Ravenna, Ohio. You represented this facility during the inspection. The facility was inspected for compliance with both State and Federal regulations for the handling of hazardous wastes.

The following violations and/or concerns were noted during this inspection:

Descri	ption	of	Viol	ation	or	Concern

1. The proper shipping name must be designated on all manifest forms.

All facility personnel in contact with hazardous waste must be trained and take part in annual reviews.

- 3. Each facility personnel in contact with hazardous waste must have a specific job description and documented training as required.
- 4. The inspection forms must indicate who conducted the inspection.
- 5. Adequate aisle space must be maintained in the hazardous waste storage area.
- 6. A list of all emergency equipment, it's location, description and capabilities must be contained in the Contingency Plan.
- A copy of the Contingency Plan must be submitted to all local and State emergency services authorities.

Regulation

40 CFR Part 262.21 OAC 3745-52-21

40 CFR Part 265.16 OAC 3745-65-16

40 CFR Part 265.16 OAC 3745-65-16

40 CFR Part 265.15 OAC 3745-65-15

40 CFR Part 265.35 OAC 3745-65-35

40 CFR Part 265.52 OAC 3745-65-52

40 CFR Part 265.53 OAC 3745-65-53



Re: DHMM

General Electric - Ravenna Lamp Plant

Portage County 02-67-0158

General Electric Company 6800 N. Chestnut Street Ravenna, Ohio 44266 June 16, 1982

Attn: Jim Magella

Dear Mr. Magella:

On May 6, 1982, this writer met with you and conducted an inspection of your facility with regard to hazardous materials management. A copy of the inspection report is enclosed for your information.

Your facility appears to be very organized with regard to hazardous materials management. Flow charts had been developed for implementing emergency procedures and also tracking the movement of hazardous materials, from raw product stage through waste production. The following deficiencies, however, were noted during the inspection:

Description of Violation	Regulation
Personnel training should be more clearly documented.	40 CFR 265.16 (d)(e) & ORC 3745-55-16-D, E
Contingency Plan should include a description of the emergency equipment.	40 CFR 265.51 & ORC 3745-55-51
Operating record should be kept current.	40 CFR 265.73 and ORC 3745-55-73

Also, your hazardous waste permit should be modified to match the hazardous wastes handled at the facility. A permit modification request should be sent to both U.S. EPA and Ohio EPA.

Please respond to the deficiences within 30 days of receipt of this letter. A copy of the inspection report is being forwarded to U.S. EPA - Region V. Please feel free to contact me or Kathy Homer of U.S. EPA at (312) 866-3718 if you have any questions.

Sincerely,

Theer Takous

Helen Takacs
Environmental Scientist
Division of Hazardous Materials
Management

cc: Paula Cotter, DHMM, C.O.
Peggy Vince, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA Region V

HT: km

ENCLOSURE

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

			,	HWFAB # 02-67-015
PART 1. GENERAL INFORMATION	U.S. EPA I	.D. # OHD 05906/3/7		
Facility: GE - RAVENNA L	AMP PL	ANT Address: 6800 N. CHESTNUT	57.	City: RAVENNA
State: OHIO	_ Zip Co	de: <u>44266</u> County: <i>PartAGE</i>	Telephone:	(214) 297-0861
		INSPECTION PARTICIPANTS(S)		
(Name)		(Title)		(Telephone)
		FACILITIES ENGINEER		216) 297-0861
2.3.		•		
		INSPECTOR(S) OHIO EPA	. (2	216) 425-9171
2				
		INSTALLATION ACTIVITY		
Mark One	If th	e site is a TSDF, check the boxes indicatin	ng which regu	lations are applicable.
Generator only (G)	\bowtie	General Facility Standards, Preparedness and Prevention, Contingency and Emergency,		Waste Piles SO3
Transporter (T)		Manifests/Records/Reporting, Closure	·	Land Treatment D81
TSDF only	\bowtie	Containers SO1		Landfills D80
G-T		Tanks S02/T01		Chemical/Physical/
G-TSDF		Surface Impoundments S04/T02	· ,	Biological TO4
T-TSDF		Incineration/Thermal Treatment	<u></u> /	Groundwater Monitoring
G-T-TSDF			<i></i>	Post-Closure
•	ī	•		

Revised 9/15/82

PART	2.	GENERATOR	REQUIREMENTS
------	----	-----------	--------------

		<u>Ye s</u>	No	N/A	Remark #
ĉ	The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	X			ended manhate makes (* Territo)
ì	Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 recycle/reuse)?	<u>X</u>	e ⁿ -t-valorie dell'Acid	, pad gamentan	SOLUENTS
1	Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater creatment unit (Section 265.1(c)(10)).	X			NIIRIC ACID NEURACIZATA
	The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				DESIGNATE
ĉ	The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.		X		PROPER SHIPPING NAME AND. UNIT DESIGNAT ON SENERATOR
t	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	X		,	2 C/ Y
C	Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	X			-
C	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	· •—•-		X	**************************************
e	e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	X			

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

PAR	RT 4. GENERAL INTERIM STATUS REQUIREMENTS			
	SUBPARTS INCLUDED			
3: C:	grand and a solution		Requirem	aents
	Subpart B: General Facility Standards			
		<u>Yes</u> N	<u>N/A</u>	Remark #
1.	The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<u> </u>		•
2.	The operator has a written waste analysis plan which describes analytical parrameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<u>×</u> _	rapidagaa pinggapagapinda	
3.	a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	>	<u> </u>	
	 Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)). 		Δ	***************************************
	IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".			
4.	The facility has -			
	a) A 24-hour surveillance system, <u>or</u>	<u>X</u> _	namena dispersional	
	 b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2). 	Χ		

		<u>Ye s</u>	No	N/A	Remark #
	Subpart C: Preparedness and Prevention				
1.	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	· <u></u>	X		·
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
	a) Internal alarm system.	X			
	 Access to telephone, radio or other device for summoning emergency assistance. 	X		Mary and the same of the same	·
	c) Portable fire control equipment.	\times			•
-	d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X	-		
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	X			
•	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	X	<u></u>	970-millionado - 1	
·	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)		_X_		NEED ADEQUATE AISLE DPACE
	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	X			
•	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			X	

}	le s	No	N/A	Remark	#

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

by	Section 265.73 which contains the following information:	-			
a)	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)	Χ.	er de stresser e do		
ь)	Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u>X</u> .			k ************************************
c)	The estimated (or actual) weight, volume or density of the waste material(s).	X	-	••••••••••	***************************************
d)	A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		NCED EPA HANDLING CODE
e)	The present physical location of each hazardous waste within the facility.	<u> </u>		 ,	
f)	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)			\times	B-17 AND -17 ST
g)	Records of any waste analyses and trial tests required to be performed.	X			
h)	Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).	X		-	
i)	Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).	01-2-1-2 1		X	**************************************
j)	Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	X			

,			162	110	NA	Kemark #
	b)	A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.		d-septidos	X	
	c)	An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	X	***************************************	Alternativature	
	d)	A description of steps taken to decontaminate facility equipment.	X			
	e)	The year closure is expected to begin and a schedule for the various phases of closure.		X		NEED CLOSURE YEAR OR EXPLANATION
2.		Closure Plan has been amended within 60 days in response to any changes facility design, processes or closure dates.	******		X	***********************
3.	The 180	Closure Plan has been submitted to the Regional Administrator/Director days prior to beginning the Closure process.	Man		X	W. S. P. I. M. P. I. M. P. I. M. B. I. W. I. M. B. I. W. I. M. B. I. W.
		Subpart H: Financial Requirements				
1.		owner or operator of the facility has established financial assurance closure by use of one of the following: (265.143)				
	a)	A closure trust fund, or		\perp		
	b)	A surety bond, or		X	· - · · · ·	
	c)	A closure letter of credit, or	X			
	d)	A combination of financial mechanisms.	- 	\times		
NOT	<u>E</u> :	COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.				

0: Incinerators

PART 5. TREATMENT/STORAGE/DISPOSAL

I: Management of Containers

SUBPARTS INCLUDED

L: Waste Piles

	Management of Tanks Surface Impoundments	M: N:	Land Treatment Landfills	P: Q: 	Thermal T Chemical/			logical	Treatmen
	·	Su	bpart I: Management of Con	tainers		, , , , , , , , , , , , , , , , , , , 			
						<u>Ye s</u>	<u>No</u>	N/A	Remark #
1.	Hazardous wastes are stored in con	tain	ers which are:						
	a) Closed (265.173)					\angle	-		
	b) In good physical condition (26	5.17	1)			X			****
	c) Compatible with the wastes sto	red	in them (265.172)			X			
2.	Containers are stored closed excep wastes. (265.173(a))	t wh	en it is necessary to add o	r remove		X		•	
3.	Hazardous waste containers are not which may rupture the container or					X			
4.	The area where containers are store corrosion at least weekly and such				•	X			
5.	Containers holding Ignitable or Red (15 meters) from the property line such wastes in Section 265.17 (phymet (265.176).	and	the general requirements for	or handli		X			
6.	Containers holding hazardous waste which may interact with the waste					X	-		

PART 1. GENERAL INFORMATION	U.S. EPA I.D. NO. 0HD05906/3/7
Facility: GE-Ravenna Lamp Plant Address	: 6800 North Chestnut St. City: Ravenna
, ,	County: <u>Portage</u> Telephone: <u>216/297-0861</u>
Facility Operator:	Title: Telephone:
Facility Owner: GE - Nela Park	Address: Nela Park-Noble Road
City: <u>Cleveland</u> State: <u>Ohio</u>	Zip Code: 44112 Telephone: 216/266-2111
Type of Ownership: Private	Government State HWFAB No. 02-67-0/58
Date of Inspection: 5/6/82 Advance Notification? NoYes:	Time of Inspection: (Start) <u>パロ</u> (Finish) <u>2130</u>
Weather Conditions: 75° F, Sunny	
· · · · · · · · · · · · · · · · · · ·	
(Name)	TION PARTICIPANT(S) (Title) (Telephone) 7/1/100 Engineer 216/297-086/
4.	

INSPECTOR(S)

	(Name))	(Telep	hone)
1.	Helen Takacs	Enviro	nmental	Scientist	216/425	-9171
2.						
3.						······································
4.	*		· · · · · · · · · · · · · · · · · · ·			
· ·						
1.	Type(s) of hazardous waste site activ	ity: A.	√ Generatio	on B.	Storage C.	Treatment
				tation E		
2	Specific hazardous wastes handled at				* .	
L.		•	1	•.		
	a) Listed Wastes: <u>See Pag</u>	zc /-2	A			

		·				ļ
	b) Non-Listed Wastes: D001	С	R	Т		
	D001	D002	D003	D000	:	•
			· · · · · · · · · · · · · · · · · · ·			
3.	llas this facility submitted a Part A I	Permit Appl	ication? 🗸	Yes	No Remark	.t.± /
	·					
7.	Does this facility store, treat or di		,	raste from any of		11 062 :
	Yes, See Remark #		No No			

MATERIAL	EPA WASTE I.D.#	CLASS	FLASH POINT	DOT ID #_	SP GR	LB/GAL	LB/DRUM (55 GAL)	
TRICHLOROETHYLENE	F001	тох		UN1710	1.46	12.13	667	BULK - RECLAIM
ACETONE	F003	IGN	0°F	UN1090	0.791	6.53	632	RECLAIM
METHYLENE CHLORIDE (Γ `HLOROMETHANE) ORM-A	F002	тох		UN1593	1.32	10.97	603	НŴМ
BUTYL ACETATE	D001	IGN	72°F	UN1123	.883	7.34	404	BULK - RECLAIM
DENATURE ETHYL ALCOHOL	D001	IGN	41.55°F	NA1986	.816	6.781	373	RECLAIM
STODDARD (FLAMMABLE LIQ. NOS.)	D001	IGN	100°F	UN1993	.78	6.48	356	RECLAIM/HWM
MERCURY ORM-B	U151	тох		NA2809	13.54	112.5	 -	BULK-HG PUMP RECLAIM
MF^^URY/OIL	D009	тох	~ ~ •	UN1993	.884	6.85	377	BULK-VAC PUMP RECLAIM HWM

^{1.} FLAMMABLE LIQUID NOS ORM-B

^{2.} WASTE LIQUID ORM-B

5.	Does this facility store, treat or dispose of any hazardous waste from any foreign sources?
	Yes, See Remark #No
5.	Does this facility transport hazardous waste materials off-site for itself or other generators?
	Yes, Complete Part 3 (Transp.) No
	a) Applicable U.S. EPA I.D. Number
	b) Ohio P.U.C.O. GR TRSF Number
7.	A brief description of site activity:
-	Assembly of mercury, multi-vapor, and high-pressure sodium lamps

REMARKS, PART 1. (GENERAL INFORMATION)

1. A revised Part A Permit Application should be submitted to modify
the permit so that the list of hazardous wastes at the plant is correct.

PART 2. GENERATOR REQUIREMENTS

			<u>Yes</u>	No	<u>N/A</u>	Remark	#
1.	kno	hazardous waste(s) generated at this facility have been tested or are ac- wledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in pliance with the requirements of Sections 262.11 and 3745-52-11.	<u> </u>		ito entretente	* sa-an-reliam da processo con como com	•••
2,	tio	s this facility generate any hazardous wastes that are excluded from regula- n under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections .6 and 3745-51-06 (recycle/reuse)?				list on	_psg 1-2A
ქ.		s this facility have waste or waste treatment equipment that is excluded n regulation because of totally enclosed treatment (Sections 265.1(c)(9)	e e	1			wasks
	and	3745-55-C-9 or via operation of an elementary neutralization unit and/or tewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>/</u>				goes to
4.		generator meets the following requirements with respect to the preparation, and retention of the hazardous waste manifest:		•	•	Ravenna	. WWTP
	a)	The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.			,		_
	b)	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.			us ukurdikun 1990		βF
	c)	Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.					_
-	d)	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a),					

e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.

			<u>Yes</u>	No	N/A	Remark #
	The	generator meets the following hazardous waste pre-transport requirements:				
	a)	Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>/</u>	· .	dra-sim-three-	
	b)	Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.		an environment	ands	
	. c)	The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	1/			
	The	generator meets the following recordkeeping and reporting requirements:	.	:		
	a)	The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.				· A
	b)	The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.				
•	Haza	ardous wastes imported from or exported to foreign countries are handled in ordance with the requirements of Sections 262.50 and 3745-52-50.	:			
3.	tan Sec	the generator elects to store hazardous waste on-site in <u>containers</u> or <u>ks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under tions 262.34 and 3745-52-34, the following requirements with respect to storage are met:	-		<u>~</u>	
	a)	Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	-		1	
				4	:	

		Yes	NO.	N/A	Remark #
b)	The date that accumulation began is clearly marked on each container.		· · · · · ·	$ \mathcal{L} $	
c)	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).				
d)	Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (pt sical separation, signs and safety) are met.		***********		
e)	Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.		,	<u></u>	
f)	Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	· ·			
g)	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).		Changes and the second		
h)	Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	***************************************	:	<u></u>	
tio men 6 m	generator has provided a Personnel Training Program in compliance with Secns 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equiptoperation and emergency response procedures, training new employees within onths and providing an annual training program refresher course (Sections .34 and 3745-52-34).	<u> </u>			
374	generator keeps all of the records required by Sections 265.16(d)(e) and 5-55-16-D-E including written job titles, job descriptions and documented loyee training records (Sections 262.34 and 3745-52-34).	1			

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9.

10.

Yes No N/A Remark #

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

PART 3. TRANSPORTER REQUIREMENTS

		<u>Yes</u>	<u>No</u>	N/A	Remark #
1.	The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	we a		·	
2.	The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.				
<u>3</u> .	The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	· · · · · · · · · · · · · · · · · · ·	 	· ,	·
4.	Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).		National Control of the Control of t		
5.	The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).			-	
6.	If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.				
7.	If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	· · · · · · · · · · · · · · · · · · ·			
8.	Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?		·	state and the state of the stat	
	a) Was immediate action/taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).				,

		Yes No N/A Remark i
	•	Were all of the notifications required by Sections 263.30(c)(d) and 3745- 53-30-C-D made?
	c)	Was the discharge cleaned up as required by Sections 268.31 and 3745-53-31?
9.		s the transporter store hazardous wastes temporarily while they are in nsit?
	a)	Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)
		그는 그는 그는 그는 그는 그는 그를 가는 그들은 그는 그를 하는 것이 되는 것이 없는 그를 가는 것이 되는 것이 되는 것이 없는 것이 없는 것이다.
<u>NO 1</u>		TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.
٥.	Doe	s the transporter import hazardous waste into the United States?
1.	Doe scr	s the transporter mix hazardous wastes of different U.S. DOT shipping de- iptions by placing them into a single container?

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: C: D:	Pre	neral Facility Standards E: Manifest/Records/Reporting E: Manifest/Records/Reporting F: Ground Water Monitoring Ontingency and Emergency G: Closure	}equir	ements
		Subpart B: General Facility Standards		
		Yes No	<u>N/A</u>	Remark #
1.	ria	e operator has a detailed chemical and physical analysis of the waste mate- il containing all of the information which must be known to properly treat store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.		
2.	ram any	e operator has a written waste analysis plan which describes analytical paneters, test methods, sampling methods, testing frequency and responses to process changes that may affect the character of the waste (Sections 265. b) and 3745-55-13-B).	•	
3.	ope cil	required due to the actual hazards associated with the waste material, the erator has prevented unauthorized access to the active portions of the fatity and has provided the following features and equipment (Sections 265.14 3745-55-14).		
	a)	24 hour surveillance system.		
	ь)	Artificial or natural barrier completely surrounding the active portion of the facility.	* **	
	c)	Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).		
	d)	"Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).		
				₹

	Yes No N/A Remark #
4.	The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)
	a) Inspect emergency equipment.
	b) Inspect monitoring equipment.
	c) Inspect security, alarm and communications devices.
	d) Inspect process equipment (pipes, pumps, etc.).
	e) Inspect containment structures (dikes, curbs, etc.).
	f) Inspect facility for structural malfunctions (roof, floor, etc.).
	g) Inspect hazardous waste handling/loading areas each day used.
	h) Record of any malfunctions due to equipment or operator errors.
	i) Record of any hazardous waste discharges.
5.	The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.
6.	The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.
7.	If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).

		Yes NO NYA Remark #	
	a)	Protection from sources of ignition.	
	b)	Physical separation of incompatible waste materials.	
	c)	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	
	d)	Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	'n
		Of wask material Subpart C: Preparedness and Prevention	io
1.		there been a fire, explosion or non-planned release of hazardous waste at	4
2.		required due to actual hazards associated with the waste material, the fa- ity has the following equipment: (265.32 and 3745-55-32).	
	a)	Internal alarm system	
	b)	Access to telephone, radio or other device for summoning emergency assistance.	
	c)	Portable fire control equipment.	
	d)	Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	
3.	All as	required safety, fire and communications equipment is tested and maintained necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	
4.	son.	required due to the actual hazards associated with the waste material, per- nel have immediate access to an emergency communication device during times n hazardous waste is being physically handled (Sections 265.34 and 3745-55-	

4-3

			<u>Ye</u>	<u>S</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
· .	ade	required due to the actual hazards associated with the waste material, quate aisle space to allow unobstructed movement or emergency or spill trol equipment is maintained (265.35 and 3745-55-35).	<u>_\\</u>	_	govern-James .	nà ya i cim t	an Andrews (Marketon London
j.	fac ser	required due to the actual hazards associated with the waste material, the ility has attempted to make appropriate arrangements with local emergency vice authorities to familiarize them with the possible hazards and the faity layout (265.37(a) and 3745-55-37-A).	_ <u></u>				
7 •	int	re state or local emergency service authorities have declined to enter o any proposed special arrangements or agreements the refusal has been umented (265.37(b) and 3745-55-37-B).		· 		<u>/</u>	· · · · · ·
		Subpart D: Contingency and Emergency				•	
l.	fir	facility has a written Contingency Plan designed to minimize hazards from es, explosions or unplanned releases of hazardous wastes (265.51 and 3745-51) and contains the following components:					
	a)	Actions to be taken by personnel in the event of an emergency incident.				Carrent State - No.	
	b)	Arrangements or agreements with local or state emergency authorities.	سلا	_			
	c)	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	_1/				
	d)	A list of all emergency equipment including location, physical description and outline of capabilities.	i	 -a			_2
	e)	If required due to the actual hazards associated with the waste(s) handled an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	3 k	_			
2.	has mig	copy of the Contingency Plan and any plan revisions is maintained on-site and been submitted to all Local and State emergency service authorities that that the required to participate in the execution of the plan. (Sections 265. and 3745-55-53).			;		

4-4

				Yes	<u>No</u>	N/A	Remark #
3.	The fai	e plan is revised in response to facility, equipment and personnel changes ilure of the plan (265.54 and 3745-55-54).	i or				63 400 - 300 - 1
4.	tan the	emergency coordinator is designated at all times (on-site or on-call) is miliar with all aspects of site operation and emergency procedures and has authority to implement all aspects of the Contingency Plan (Sections 265 and 3745-55-55).		<u>/</u>			
5.	men and	an emergency situation has occurred, the emergency coordinator has imple- nted all or part of the Contingency Plan and has taken all of the actions i made all of the notifications deemed necessary under Sections 265.56 i 3745-55-56.			- Normani-vis-view	<u>i/</u>	
		Subpart E: Manifests/Records/Reporting			•		
NOTI		THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TR FACILITIES.		NT, :	STORAGE No	AND I	DISPOSAL Remark #
1.	The by	operator maintains a written operating record at his facility as require Sections 265.73 and 3745-55-73 which contains the following information:			· · · · · · · · · · · · · · · · · · ·		(
	a)	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-8-1).		· .	<u> </u>	***************************************	3
	þ)	Common name, EPA Hazardous Waste Identification Number and physical stat (liquid, solid, gas) of the waste(s).	e (alered d'ester-aler-mail	
	c)	The estimated (or actual) weight, volume or density of the waste material(s).			•	-	
	d)	A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		<u> 1</u>			

4-5

				<u>Yes</u>	<u>No</u>	N/A	Remark #
•	e)	e) The present physical location of each hazardous waste within the	facility.		The state of the s	toward - O	**************************************
	f)	f) FOR DISPOSAL FACILITIES, the location and quantity of each hazard recorded on a map of the facility and cross-references to any per manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	ous waste tinent			/	and the second s
	g)	g) Records of any waste analyses and trial tests required to be perf	ormed.				
	h)	h) Records of the inspections required under Sections 265.15 and 374 (General Inspection Requirements - Subpart B).	5-55-15		***************************************	************************************	Carrier,
	i)	i) Records of any monitoring, testing or analytical data required un Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-	der other 6.			-	· · · · · · · · · · · · · · · · · · ·
	j)	j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY estimates required under Subpart H and Section 3745-56-30, 32 and) cost 34.	_		è	•
2.	por	The operator has submitted an annual Treatment-Storage-Disposal Opera port (by March 1) containing all of the operating information requires Sections 265.75 and 3745-55-75.	ting Re- d under			· · · · · · · · · · · · · · · · · · ·	
<u>NOT</u>	<u>E:</u>	THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY 0 3745-52-41.	GENERATORS	UNDER	SECTIO	NS 262	.41 AND
3.	was	When applicable, the operator has submitted reports on releases of hawastes, fires, explosions, groundwater contamination data and facility (265.77 and 3745-55-77).	zardous y closure			<u></u>	
ТОИ	<u>E:</u>	E: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT	NT, STORAGE	: AND D	ISPOSA	L FACI	LITIES.
4.	the	Manifests received by the facility are signed and dated; one copy is the transporter, one copy is sent to the generator within 30 days and is kept for at least 3 years (Sections 265.71 and 3745-55-71).	given to one copy	and the second		<u>/</u>	

			165	IVU	N/A	Remark #
•	a) If shipping papers are used in lieu of manifests (bulk shipments, the same requirements are met (265.71(b) and 3745-55-71-B).	etc.)				
	b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) and 3745-55-72-A, are noted in writing on the manifest dement (Sections 265.71(a)(2) and 3745-55-71-A-2).		-		<u>/</u>	
5.	Any manifest discrepancies have been reconciled within 15 days as requisections 265.72(b) and 3745-55-72-B or the operator has submitted the information to the Regional Administrator/Director.				· · ·	
6.	If the facility has accepted any unmanifested hazardous wastes from of sources (except from small quantity generators) for treatment, storage posal an unmanifested waste report containing all the information requisections 265.76 and 3745-55-76 has been submitted to the Regional Admin Director within 15 days.	or dis-	-		1	
	Subpart F: Groundwater Monitoring	NIA		•	•	
ТОИ	E: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND AFTER NOVEMBER 19, 1981.	S AND LAND	TREATM	ENT FA	CILIT	IES ON
			Yes .	<u>No</u>	N/A	Remark #
1.	The facility has implemented one or more of the following alternatives spect to the Groundwater Monitoring requirements in Sections 265.90(a) 55-90-A:	with re- and 3745-	(
	a) A Groundwater Monitoring System meeting the minimum requirements of 265.91 and 3745-55-91 has been installed which is sampled, tested a ated in accordance with the requirements of Sections 265.92, 265.93 3745-55-92, -93 and -94.	and oper-				: !
						

		The second of th	N/A	Kemark #
	b)	A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.		
	c)	An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	***************************************	
		Subpart G: Closure and Post-Closure		•
тои	<u>E:</u>	THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:		
1.		ritten Closure Plan is on file at the facility and contains the following ments: (Sections 265.112 and 3745-56-03)	<u>N/A</u>	Remark #
	a)	A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	******	closure not
J'	b)	A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.		anticipated
	c)	An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.		
	d)	A description of steps taken to decontaminate facility equipment.	<u> </u>	
	e)	The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u>/</u>	closure not
2.	The fac	Closure Plan has been amended within 60 days in response to any changes in ility design, processes or closure dates.	1/	no changes

	<u>Yes No</u>	<u>N/A</u>	Remark #
3.	The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	1	
4.	If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	1	
	a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.		
	b) Upon completion of Closure all facility equipment and structures were de- contaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).		
	c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).		
NOT	E: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.	÷.	·
5.	A written Post-Closure Plan is on file at the facility which describes all Post- Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.		
6.	The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.		
7.	The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	-	
8.	The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.		

NA

Yes No N/A Remark #

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTUBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

- 1. Personnel training should be more clearly documented as to who received training & what training was received.
- 2. A description of the capabilities of emergency equipment should be included in the contingency plan.
- 3. The operating record should include a current amount of all hazardous wastes in the storage area.

PART 5. TREATMENT/STORAGE/DISPOSAL

I: Management of Containers

J: Management of Tanks

K: Surface Impoundments

L: Waste Piles

M: Land Treatment

N: Landfills

0: Incinerators

Thermal Treatment

Q: Chemical/Physical/Biological Treatment

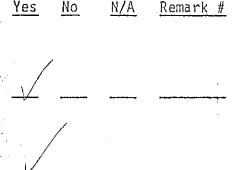
Subpart I: Management of Containers

- 1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265. 171, .172, .173 and 3745-56-51,-52-53).
- 2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).

Yes No N/A Remark #

FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

- 3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).
- 4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).



	Yes	<u>No</u>	N/A	Remark #
5.	Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C). Subpart J: Storage in Tanks		***************************************	
1.	The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a wastefeet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	· · · · · · · · · · · · · · · · · · ·		
2.	Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	gasampunk 1	•	
3.	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).			
4.	Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).		107	- \
5.	Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	· · · · · · · · · · · · · · · · · · ·		· ·
	a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			
	b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	Appenhadratory	gayayaya ka da	

N/A

		10000	•		
		<u>Yes</u>	<u>No</u>	N/A	Remark #
6.	With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	Total			
	a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.		****		·
	b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.			<u> </u>	
7.	Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).			£	
8.	Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).		•		
9.	Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).		*********		
: •	Subpart K: Surface Impoundments				
1.	The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).		·		
2.	Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	- Andrews	Burgasses		
	<i>f</i> -				



Application Number 81-HW-0158 Portage County

September 1, 1981

Jim Magella, Manufacturing Engineer General Electric Company 6800 N. Chestnut Street Ravenna, Ohio 44266

Dear Mr. Magella:

On August 20, 1981, Jack Burgan of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by yourself.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours, and Floringer

Paul Flanigan, P.E.

Hazardous Waste Materials Management

PF/bsr

Kathleen Homer, U.S. EPA, Region V

Jack Burgan, NEDO

CERTIFIED MAIL

TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A.— General Facility Standards

I. General Information:

(A)	Facility Na	me: <u>General</u>	Electri	ic Com	· pany =	Raven	na Lam	p Plant
(B)	Street: <u>4</u>	6800 North	h chest	int st	eet	· •		,
		venna				(E)	Zip Code:	44266
(F)	Phone: 2	16-297-06	361	(G) Cour	nty:	Port	996	
(H):	Operator:			Same				
(I·).	Street: _							
(J)	City:		(K) S	State: _		(L)	Zip Code	
(M)	Phone:			(N) Count	y:	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
(0)	Owner:	Nela Pari	L - Ge	mera	1 Elec	tric Co	mpony	
		Nela Park.				- 124.5		
(Q)	City: _C	leveland	(R) S	State: _	6 H	(\$)	Zip Code:	44112
		6-266-7						
		spection: 20 A	and the second s				<i>y</i>	
(X) ⁻	Weather Con	nditions: $\underline{\mathcal{S}_i}$	inny & L	<u>Jarm</u>	<u>.</u>	i	egyppopenya nyaéta da 2006 da a	

·(Y)	Person(s) Interviewed Jim Mage //a	Mfg. Eng.	Telephone 2/6 - 297 - 084 -
.			
(Z)	Inspection Participants	Agency/Title	Telephone
(AA)	Preparer Information		· · · · · · · · · · · · · · · · · · ·
	Name Jack L. Burgon	Agency/Title OEPA - DSWS	Telephone 216-425-9171
	<u>II.</u>	SITE ACTIVITY:	
	Complete sections I through VII for facilities. Complete the forms (in to the site activities identified by	n parenthesis) in section (and/or disposal VIII corresponding
<u> </u>	A. Storage and/or Treatment 1. Containers (I) 2. Tanks (J)	D. Incineration an (O and P)	d/or Thermal Treatment
r	3. Surface Impoundments (K) 4. Waste Piles (L) 3. Land Treatment (M)	E. Chemical, Physi Treatment (Q)	
	C landfille (N)		•
	C. Landi III 5 (N)		
v - v	and the second s		
Not	e: If facility is also a generator IX and X of this form as appropr	or transporter of hazardou iate.	s waste complete sections

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	•				
		Yes	No	NI*	Remark
1.	Receipt of hazardous waste from a foreign source?	endelsijge	X	-	N/A
2.	Facility expansion?		X	-	<u>N/A</u>
Gen	eral Waste Analysis:				
1.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X.	umifminumo		
2.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	×	TOURS		
3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	enformations	X	-	No such woste
Sec	urity - Do security measures include (if applicable)	:			
1.	24-Hour surveillance?	X			
2.	Artificial or natural barrier around facility?	X	RIDENTALISED	No.	
3.	Controlled entry?	X		-	
4.	Danger sign(s) at entrance?	X	•		
		•			
1.	Records of malfunctions?	-	*	Market Carles	No occurrence
2.	Records of operator error?		X		No occurrence
3.	Records of discharges?	hiititiissa	X	•	No occurrence
	2. Gen 1. 2. 3. Sec 1. 2. 1. 2.	 Receipt of hazardous waste from a foreign source? Facility expansion? Facility expansion? Has the owner or operator obtained a detailed chemical and physical analysis of the waste? Does the owner or operator have a detailed waste analysis plan on file at the facility? Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include (if applicable) 24-Hour surveillance? Artificial or natural barrier around facility? Controlled entry? Danger sign(s) at entrance? Records of malfunctions? Records of operator error? 	Has the Regional Administrator been notified regarding: 1. Receipt of hazardous waste from a foreign source? 2. Facility expansion? General Waste Analysis: 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 1. 24-Hour surveillance? 2. Artificial or natural barrier around facility? 3. Controlled entry? 4. Danger sign(s) at entrance? Do Owner or Operator Inspections Include: 1. Records of malfunctions? 2. Records of operator error?	Has the Regional Administrator been notified regarding: 1. Receipt of hazardous waste from a foreign source? 2. Facility expansion? Keneral Waste Analysis: 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 1. 24-Hour surveillance? 2. Artificial or natural barrier around facility? 3. Controlled entry? 4. Danger sign(s) at entrance? Do Owner or Operator Inspections Include: 1. Records of malfunctions? 2. Records of operator error?	Has the Regional Administrator been notified regarding: 1. Receipt of hazardous waste from a foreign source? 2. Facility expansion? 3. General Waste Analysis: 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 1. 24-Hour surveillance? 2. Artificial or natural barrier around facility? 3. Controlled entry? 4. Danger sign(s) at entrance? Do Owner or Operator Inspections Include: 1. Records of malfunctions? 2. Records of operator error?

III. GENERAL FACILITY STANDARDS - Continued

			Yes	No	NI*	Remarks
•	4.	Inspection schedule?	X	***	**	
	5.	Safety, emergency equipment?	X	सीच सीच-क्र्रम	***	\$\$\$ \$\$\$ \$\$\$ \$\$\$ \$\$\$\$ \$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$
	6.	Security devices?	X	•••	•••••	\$\$\$\$ \$\$\$ \$\$\$ \$\$\$\$ \$\$\$\$ \$\$\$\$\$\$\$\$\$\$\$\$\$\$\$
	7.	Operating and structural devices?	X	4 0 40	*** **	\$\tau \tau \tau \tau \tau \tau \tau \tau
	8.	Inspection log?	X	⊕ ⊕ ⊕	49+ 430 Ngr	\$\psi \omega \om
(E)	Do inc	personnel training records lude: (Effective 5/19/81)				
	1.	Job titles?	X	e	6-4-4-	
	2.	Job descriptions?	X	***	\$ \$ \$	\$\phi \tau \tau \tau \tau \tau \tau \tau \tau
	3.	Description of training?	X	خيستيه جيد		\$\\phi \tau \tau \phi \phi \phi \phi \phi \phi \phi \phi
	4.	Records of training?	X	***	***	
	5.	Have facility personnel received required training by 5-19-81?	<u>X</u>	-	***	
	6.	Do new personnel receive required training within six months?	<u>X</u>		· • • • • • • • • • • • • • • • • • • •	\$
(F)	req	required are the following special uirements for (gnitable reactive, or ompatible wastes addressed?			•	
	1.	Special handling?	X	Contractive Con	***	\$\dagger\$\dagg
	2.	No smoking signs?	X		**	��������������������������������������
•	3.	Separation and protection from ignition sources?	X	600	తాసా భా	<i>ઌ</i> ૾૽૽ૻ૽ઌ૽ઌ૽૽૽૽૽૽૽૽૽૽ઌ૽૽૽૽૽ઌ૽૽૽૽૽૽૽ઌ૽૽૽૽ઌ

*Not Inspected

IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

(A)		ntenance and Operation Facility:	Yes	No	NI*	Remarks
	1	Is there any evidence of fire, _ explosion, or release of hazardous waste or hazardous waste constituent?		<u>*</u>		No securence
(B)	If hav	required, does the facility e the following equipment:		•		•
	1.	Internal communications or alarm systems?	X		- And State of State	
	2.	Telephone or 2-way radios at the scene of operations?	X		***************************************	
	3.	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>*</u>	-		
		licate the volume of water and/or foar		4		re control:
		S.E. Property		e /y	bock	dup by wellow
(C)	Tes		w f f	a /y	bock	dup by wellow
(c)	Tes	S.E. Broperty sting and Maintenance of	X	<u> </u>	beck	dup by wellow
(c)	Tes Eme	sting and Maintenance of ergency Equipment: Has the owner or operator established testing and maintenance procedures	<u>X</u>	<u> </u>	<u>b</u> ec./4	dup by wellow

(E)	Is there adequate aisle space		
	for unobstructed movement?	<u> </u>	

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A)		s the Contingency Plan contain the lowing information:	Yes	No	NI*	Remarks	
	1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste					
		management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<u>\X</u>	-	•	***************************************	
	2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X		**********		
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u>X</u>		****		
	4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X	**************************************	Application		
	5.	An evacuation plan for facility personnel where there is a possibilit that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	y				

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	•				
		Yes	No	NI*	Remarks
·(B)	Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C)	Emergency Coordinator				
	Is the facility Emergency Coordinator identified?	X			
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	Ŕ			
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X	**************************************		
(D)	Emergency Procedures				
,	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		X	discretification .	No occurrence
	VI. MANIFEST SYSTEM, R (Part 26	RECORDA	EEPING	S, AND I	REPORTING
	tiai e	Yes		NI*	Remarks
(A)	Use of Manifest System				
	1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u> </u>		- Alle Managemay	
	2. Are records of past shipments retained for 3 years?	X	-	فلاكنسي	will be
(B)	Does the owner or operator meet requirements regarding manifest discrepancies?	· · · · · · · · · · · · · · · · · · ·	X	. annipozacio	No occurrence

VI. RECORDKEEPING - Continued

. (C)	Opera	iting Record					
	n Y	Does the owner or opmaintain an operating ecord as required in 165.73?	ig	<u> </u>			
	C	loes the operating r contain the following nformation:			•		
	**	The method(s) an of each waste's storage, or disp required in Appe	treatment, osal as	X _			
٠.		 The location and of each hazardou within the facil 	s waste	<u>*</u> _			
	***d	A map or diagram cell or disposal showing the loca quantity of each waste? (This in should be crossto specific maninumber, if waste accompanied by a	area tion and hazardous formation referenced fest was				
	е	Records and resu waste analyses, monitoring data, inspections?	trial tests,	<u>×</u> _			
	f	 Reports detailing incidents that re implementation of Contingency Plan 	equired f the	<u>X</u>		boccu.	rence
	9	• All closure and p costs as applical (Effective 5-19-	ole?	* _			1.
	**	See page 33252 of t	the May 19, 1980,	Federal Re	gister.	,	÷
	***	Only applies to dis	sposal facilities	,			

^{*}Not Inspected

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

		•	Yes	No	NI*	Remarks
۹)	Clo	sure and Post Closure				
	1.	Is the facility closure - plan available for inspection by May 19, 1981?	×		thirthin, ma i	
	2.	Has this plan been submitted to the Regional Administrator	4-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	X	*****	slot regulied
	3.	Has closure begun?			•	See .
	4.	Is closure estimate available by May 19, 1981?	*		•	
В)	Pos	t closure care and use of property				
	a p	the owner or operator supplied ost closure monitoring plan? fective by May 19, 1981)				Not required
aci	lity	VIII. FAC (Part 265, Si USE AND MANAGEN Name: <u>SE-Rovenna Long P</u>	I I MENT O	s I ti	iru R) TAINERS te of In	
			162	NO	MI.	Remarks
	1.	Are containers in good condition?	X	ومخسيطات	Carrier	
	2.	Are containers compatible with waste in them?	X	SECTION SECTION	withtheappy	
	3.	Are containers stored closed?	1	Cathagan	**************************************	
•	4.	Are containers managed to prevent leaks?	又	(midramins)		
	5.	Are containers inspected weekly for leaks and defects?	X	(III)	, 	-555
	6.	Are Ignitable reactive wastes stored at least is meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X	*LIVERS CONTROL	***************************************	**************************************

		•							
	7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X	*****		100 miles (100 miles (androque an apole do a		. a. din diregge 8
	8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	X	40-0-10	·				enn en skesny d
,			J TANKS	N	A			:	
Faci	lity	Name:	~	Date	of Insp	ection:	پستون جي جي حي جي جي جي جي جي جي جي		
	•	Are tanks used to store only those wastes which will not cause corrosi leakage or premature failure of the tank?					,,	Ole Marithus III.	
	2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?		· 		-			
	3.	Do continuous feed systems have a waste-feed cutoff?	4 4 4 '				~~~~~~~~~	•	
	4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?		~~ ~	*****	*****	3 (5-0-0-0-0 -0-0-0-0	-	
	5.	Are required daily and weekly inspections done?	. (*******	•••	4=+		**************************************		P P P P P P P P P P
	6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				to an an an an an an	~~~ ~~~~	~	en des en en
	7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)		40-45-40 4		in spin spinske spinske spinske spinske	************************************	\$\tau \tau \tau \tau \tau \tau \tau \tau	qor rego reson reson

Yes No NI* Remarks

8.	Has the owner or operator observed Associations buffer zone requiremen or reactive wastes?	the National Fire Protection its for tanks containing ignitable
	Tank capacity:	gallons
	Tank diameter:	feet
	Distance of tank from property line	feet
	(See table 2 - 1 through 2 - 6 of N Code - 1977" to determine complian	NFPA's "Flammable and Combustible Liquids nce.)
	SURFACE I	K IMPOUNDMENTS A A
acility	Name:	Date of Inspection:
٦.	Do surface impoundments have at least 60 cm (2 feet) of freeboard?	
2.	Do earthen dikes have protective covers?	
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before?	
4.	Is the freeboard level inspected at least daily?	ණාම ආ දුක්කර කරන කරන කරන කරන කරන කරන කරන කරන කරන ක
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	ా అయినా ఈమ్మామ్ ఈమామా ఉంచినామి అంచినామి మామామామ్మామ్మామ్మామ్మామ్మామ్మామ్మామ్మామ

WASTE PILES NA

acility	Name:		- Andrews	Date of	Inspection:
		Yes	No	NI*	Remarks.
1.	Are waste piles covered or protected from dispersal by wind?	do como	& & &	, ,	## ###################################
2.	Is each in-coming movement of waste analyzed before being added to the waste pile?			- All	\$\pi \pi \pi \pi \pi \pi \pi \pi \pi \pi
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	-	~~~	ww.	మాయాయాయినాన్ని మామానా ఈ చాసానా మార్గు మా భావా భావా భావా భావా భావా భావా భావా భ
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)			-	~~~
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?			Çîndîrijîn	
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)		€		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
7.	Are piles of imcompatible waste protected by barriers or distance from other waste?	~~~		allerande A	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Facility	Name:		Date	of In	specti	on:	•	
•	యావినిధిని మామి మమువు మామువు మువు మమువు మ ఈ మామై వుల్లు మైదు మ	tto etap				Appendix of the		<u> </u>
1.	Is treated hazardous waste capable of biological or chemical degradation?	⊕ € €	~	· •	<i>∞∞-</i> 0∞	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	\$	*****
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	equal (Sec. Sec.)		₩₩##		~~~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	₩₩₩₩	P TO
3.	Is waste analyzed according to 265.273?	ا مخصصت		540 4 0	⊕ -∞-∞-∞	3	ණකණකක ක ණ	~ ~ ~ ~ ~ ~ ~ ~ ~ ~
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?		Lineary	***	40ma magnagara	, -		P 10 10 to the control of the contro
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	_			***	5°4° 6°0° 8°0° 8°0° 8°0° 8°0° 8°0° 8°0° 8°0	*************************	
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?			**************************************		20 (4 ki iii 4 ki an en		
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?				₩~~	\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	· • • • • • • • • • • • • • • • • • • •	·
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	ආකාක	*************************************	(persona)	ब्यान्यक ब्यं न् क्		ి రాయిటించి ఉచ్చ బుం	<u> </u>
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)		42700-5270	•				

LANDFILLS NA

Facili	ity Name:	ua.	(e 01	Inspect) ************************************	~~~
		Yes	No	NI*	Remarks		
(A) Ger Doo	neral Operating Requirements es the facility provide the following] :					
**]	Diversion of run-on away from acti portions of the fill?	ive	40-epr		తాని ముదు భుచుచుచుచు ఉంది.	\$ 40 40 40 40 40 40 40 40 40 40 40 40 40	, paga-ga g
2	Collection of run-off from active portions of the fill?	· ••••••••••••••••••••••••••••••••••••	4000 40	യോർ	*******	\$\psi \psi^{\psi \psi} \psi \psi^{\psi \psi} \psi \psi \psi \psi \psi \psi \psi \psi	B-0-0-1
3	3. Is collected run off treated?			₩ ₩.	**	\$\dagger\tau \tau \tau \tau \tau \tau \tau \tau	
4	4. Control of wind dispersal of hazardous waste?	·	****	200-405-400	\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		♣ ��
	(**Effective 11-19-81)						
(B) Su	urveying and Recordkeeping oes the Operating Record Include:			•			
1.	 A map showing the exact location and dimensions of each cell? 			. 604	·)	
2.	The contents of each cell and the location of each hazardous waste type withing each cell?		, · 	49 (20-49	\$\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	\$ 40 - 40 - 40 - 40 - 40 - 40 - 40 - 40 	D 40 45 4
(C) C	losure and Post-Closure						
ļ	Is the Closure Plan available for inspection by 5-19-81?	duran d	D 6046	y	· ***************************	\$\tau\$ \tau\$	~~~
2	2. Has this plan been submitted to the Regional Administrator?	agas district	m doded	p w////	·	**********************	***
3	3. Has closure begun?				****		
4	4. Is closure cost estimate available by 5-19-81?	6	-	- 4	\$\rightarrow\$ \tau \tau \tau \tau \tau \tau \tau \tau	;	₩ @ @
(D) S	Special requirements for ignitable or reactive waste	•	•				
4	Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?		_ ~	- . 			-

		•	Yes	No	NI*	Remarks
	or	waste is rendered non-reactive non-ignitable see treatment uirements)				
	If 265	not, the provisions of 40 CFR .17(b) apply.				
E)		cial Requirements for Incompatible tes.				•
		s the owner or operator dispose of ompatible wastes in separate cells?		exemple:	***********	
	If 265	not, the provisions of 40 CFR .17(b) apply.			***************************************	
F)		cial requirements for liquid waste fective 11-19-81)				
	1.	Are bulk or non-containerized liquid placed in the landfill?	5			
	2.	Does the landfill have a chemically and physically resistant liner system?	vancouvitana.		***************************************	
	3.	Does the landfill have a functional leachate collection system?	***********************	· · · · · · · · · · · · · · · · · · ·	ومستون بيست	
	4.	Are free liquids stabilized prior to or immediately after placement in the landfill?	aggypannig.		wantAmptoon	
G)		cial requirements for Containers fective 11-19-81)				
	shr bef	empty containers crushed flat, edded, or similarly reduced in volume ore being buried beneath the surface the landfill?	- dominations	- Allegangan (I)	- dilikuwa	

O and P INCINERATION and THERMAL TREATMENT

A)	Facility Name:				<u></u>		
B)	Date of Inspection:					·	
	I. D	eterminati	on o	f Stea	dy Stat	е	
	- Additional Conference of the						
•	Type of unit (i.e., type of inc	inerator o	r th	ermal	treatme	nt):	
	Components and steady state con	dition:	•				•
		***	Was	this	compone	nt at SS prior 1	o adding waste?
	Component		Yes	No	NI*	Remarks	
•		_					-
		_			_		
		_					
•	1		+				
		II. Was	te A	nalysi	S		
١.	Minimum requirements, for waste	s not prev	ious	ly bur	ned/tre	eated.	
	 Required analyses; has analysis been performe for the following? 		Yes	No	NI*	Remarks	•
	a. Heating value	a de la companya de l	٠.		*********	- Andread - All the State of th	-
	b. Halogen content				-		
	c. Sulfur content		<u></u>				· · · · · · · · · · · · · · · · · ·
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			a.	Lead?					- Control of the Cont	- 	s		
			b.	Mercury?		•	خسست			***************************************			-
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	J.		Mr. 401.01.01.00.00			<u></u>							
					11	I. Monito							
						ě	Yes	No	NI*	Remarks			
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Ε.	made	e to		above, we ırn emissi **							·		
F.	ment	t in	spect		for lea	sociated ks, spill		- Annahi Sanaha III	- Cilonomilalja	Turney and the Control of the Contro			***************************************
G.	syst	tem .	alam	cy shutdowns checked ation?								,	

^{*}Not Inspected *Specify in Remarks for what period of time this was checked.

IV. Upen Burning

1

A. Only complete this part if the facility open burns hazardous waste.

		Yes	No	ΝΙ×	Remarks
1.	Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	- Augustation de la constitución		-	
2.	If this facility open- burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	and the state of t			

Pounds of waste explosives or propellants	Minimum d burning proper	listance or deto ty of o	nation	open to the
0 to 100	380 m 530 m	670 1,250 1,730 2,260	ft ft	

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

NA

	lity Name:	<u> </u>				
Date	of Inspection:					
		Yes	No	NI*	Remarks	
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?					
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)			· ·		

		Yes	No	NI*	Remarks
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	************************************	www.palikhassiwaa		
4.	Are inspection procedures followed according to 265.403?		«2000000140»	erelativishim	All the state of t
5.	Are the special requirements fulfilled for ignitable or reactive wastes?		workstation and the second	-шилиний	4966-barrens and a second and a
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.)		waterdans		
Not	waste regulations in 40 CFR Parts 122, wastewater treatment tanks that receive hazardous waste or that generate, store is a hazardous waste where such wastew 402 or 307(b) of the Clean Water Act (tanks, transport vehicles, vessels, or hazardous only because they exhibit the or are listed as hazardous wastes in Science.	264 e, st e or aters 33 U. cont cor ubpar	and 26 ore, a treat are s S.C. 1 ainers rosivi t D of	5 to own d treat a waste ubject 251 et which ty char 40 CFR	mers and operators of (1) to wastewaters that are water treatment sludge which to regulation under Sections seq.) and (2) neutralization neutralize wastes which are facteristic under 40 CFR §261.22 Part 261 only for this reason.
	1. MANIFEST	r REQ	UIREME	NTS	
		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	太	**ASSESSED-PROTECTION	REPRODUCTION OF THE PROPERTY O	equilibritation de la constitución
(B)	Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
	1. Manifest document number?	X	40004000mb	400000000000pp	
	 Name, mailing address, telephone number, and EPA ID Number of Generator 	X	- situatium		425

	3.	Name and EPA ID Number of Transporter(s)?	<u>X</u>	**************************************	-	
	4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X	-1000-040-0-		
	5.	The description of the waste(s) (DOT shipping name, DOT hazard class DOT identification number)?	<u>, X</u>			
	6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
	7.	Required certification?	X		-	
	8.	Required signatures?	*			
C)	Doe exc	s the owner or operator submit eption reports when needed?	·	X		No occurrence
		2. PRE-TRANSP	ORT R	EQUIRE	MENTS	
(A)	wit (Re	waste packaged in accordance h DOT Regulations? quired prior to movement of ardous waste off-site)	*	· ·	e	
(B)	in con (Re	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? equired to movement of hazardous te off-site)	X			
(C)		required, are placards available transporters of hazardous waste?	X	en de la companya de		

Yes

No

NI*

Remarks

$\underline{\text{Omit}}$ Section 3 if the facility has interim status and its Part A permit application describes $\underline{\text{storage}}$

3. On Site Accumulation

		Yes	No	NI*	Remarks
٦.	Are containers marked with start of accumulation date?		wife(CPublicusES)	**************************************	
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	warres	· · · · · · · · · · · · · · · · · · ·	RISKUMINI	· · · · · · · · · · · · · · · · · · ·
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?			-000000-0	
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements?		-		
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	چې <u>د</u>	, water state in the state in t	ميانينسيو <u>ي</u>	
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	dantes and the same of the sam	40000 manaka	· · · · · · · · · · · · · · · · · · ·	
	c. Do continuous feed systems have a waste-feed cutoff?	·	District on Production,	elektrikkong	
	d. Are required daily and weekly inspections done?	4000000400000	endolesconomics	waigi and distributions	
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	ر مادين مادي مادي مادي مادي مادي مادي مادي مادي	·	dinjugus	
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	**************************************	who make the	whistomorphism	

VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

•				Yes	No	NI*	Remarks
(A)	Exce	eptio ults	ifests, Annual Reports, on Reports, and all test and analyses retained for t three years?	X	and the second	where the same of	will be
(B)	Annı	ual [generator submitted Reports and Exception as required?	*			will be
			VII. INTERNA (Part 262	TIONA Sub	L SHIP part E	MENTS	
			installation imported rted Hazardous Waste?	· ——	X		
			(If answered Yes, complete the f	ollow	ing as	applic	cable.)
	1.		orting Hazardous waste, a generator:				
		a.	Notified the Administrator in writing?				
		b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?			·	
-		c.	Met the Manifest requirements?				Angle beautiful and the final delication of the second of
	2.		orting Hazardous Waste, the generator:				
		•	Met the manifest requirements?	maninistrinis .			

TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

	Are copies of the completed manifests or shipping paper(s) available for review and	· <u>-</u>	Yes	No	NI*	Remarks	
	retained for three years?						
	<u>II.</u>	INTERNA	ATIOINA	AL SHI	<u>PMENTS</u>		
Α.	Does the transporter record on the manifest the date the waste left U.S.?	he the					
8.	Are signed completed manifest(s) on file?						
		V. MI	SCELLA	MEOUS			
Α.	Does transporter transport hazardous waste into the U.S. from abroad?					<u> </u>	
в.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?						
		•					

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

RECEIVED WMD RECORD CENTER

JAN 03 1995



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GENERAL ELECTRIC CO., RAVENNA LAMP PLANT RAVENNA, OHIO 44667 OHD 059 061 317

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. C05087

EPA Region

Site No. OHD 059 061 317

Date Prepared December 17, 1991 Contract No. 68-W9-0006 PRC No.

009-C05087OH39

Prepared by PRC Environmental Management, Inc.

(Tom Sinski) (703) 556-2811

Contractor Project Manager Shin Ahn

Telephone No. (312) 856-8700 EPA Work Assignment Manager: Kevin Pierard

Telephone No. (312) 886-4448

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3/15/N

EXECUTIVE SUMMARY

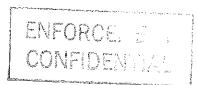
ENFORCEMENT CONFIDENTIAL

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the General Electric Co. Ravenna Lamp Plant (GE Ravenna Plant) in Ravenna, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of Resource Conservation and Recovery Act (RCRA) facilities.

The GE Ravenna Plant is located on a 56-acre site less than 1/2 mile from downtown Ravenna in Portage County, Ohio (latitude 41°10′52" N; longitude 81°14′00" W) (Killam Associates, 1990b). The facility is situated in a rural area, dotted with many small ponds and lakes within a 2-mile radius of the facility. Lake Rockwell is located approximately 3-1/2 miles west of the facility. Lake Hodgson is located 3 miles southwest of Ravenna. The facility is not located in a 100-year flood-plain area. (U.S. Geological Survey, 1974).

The GE Ravenna Plant produces energy-efficient, high intensity discharge lamps. These include mercury, multi-vapor, Lucalox lamps and ANS sunlamp arc tubes. The facility began operation in 1972 and now employs approximately 480 people (Killam Associates, 1990b).

The facility consists of one building that houses a production control office, production floor, boiler room, acid neutralization room, staging area, solvent storage room, and drum storage room. The GE Ravenna plant received RCRA interim status in 1981 for storage of hazardous waste in containers. The facility generates primarily ignitable waste solvents (D001, F001, F002, F003, and U228) and waste alcohols (methanol; U154, F005, and denatured alcohol; D001). An acid neutralization system discharges approximately 150 gallons per day of treated wastewater to the Ravenna wastewater treatment plant. Other wastes include leaded glass, scrap metal, leaded solder, waste oils (D001), and small amounts of mercury (U151). Most wastes are stored in a drum storage room (SWMU 1) in the facility. The leaded glass is sent primarily to GE Niles-Mahoning in Niles, Ohio, for reclamation. Waste oils are recycled by Canton Oil. The scrap metal and leaded solder are sent to an unspecified location for reclamation.



The PA/VSI identified the following five SWMUs at the facility:

Solid Waste Management Units

- 1. Drum storage room
- 2. Acid neutralization system
- 3. Waste leaded glass dumpster
- 4. Scrap metal dumpster
- 5. Leaded solder waste drum area

PRC did not identify any areas of concern at the facility.

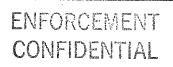
A preliminary file review revealed that a closure plan for the drum storage room (SWMU 1) submitted by GE Ravenna was disapproved by Ohio EPA (OEPA) on January 17, 1989 (OEPA, 1989a). Subsequently, GE Ravenna submitted a revised closure plan on May 2, 1989, that was approved by OEPA, with modifications, on July 12, 1989 (OEPA, 1989c). Closure activities began on December 13, 1989 (Killam Associates, 1990b).

A release of contaminants to on-site soil was identified and documented. The release occurred on December 13, 1989, during implementation of the closure plan. At that time, a drainage pipe leading from the drum storage room had been broken. Several gallons of hazardous constituents filled the trench around the pipe. The released liquid was pumped into a 55-gallon drum and sampled for analysis. The analytical results of the liquid detected the presence of 1,050 milligrams/liter of methylene chloride and 5,150 milligrams/liter of trichloroethylene (TCE). However, surrounding soil contained only small amounts of TCE (17 micrograms/liter and 10 micrograms/liter). All contaminated sections of the pipe were removed. Liquid and wash water from the trench and drain line were contained in 55-gallon drums. The soil 2 feet above and 18 inches below the pipe was excavated, sampled, and placed in lined and covered 20-cubic-yard rolloff boxes (Killam Associates, 1990b). No releases were observed during the VSI.

In June 1990, the closure plan was modified to incorporate clean levels and a sampling plan for the surrounding soils. The plan also specified procedures for removal of the remaining soil (Killam Associates, 1990b). Currently, one section of pipe remains to be cleaned. The modified closure plan activities are scheduled to be completed by October 31, 1991. At present, all soil surrounding the pipe has been sampled and found to be clean (Magella, 1991b).

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No releases to ground water were observed during the PA/VSI, nor have any documented releases been identified. The potential for release to ground water is low. Contamination from the release that occurred during the drain line excavation has been removed. All sections of the drain line that were contaminated have been removed. The soil surrounding the pipe has been tested and found to be clean (Magella, 1991b). In addition, the drain line has been sealed. The potential for release to ground water from other SWMUs is low because all wastes are stored indoors. The threat of exposure to contaminants via ground water contamination is low because soils surrounding the drain line have been sampled and found to be clean. The city of Ravenna to the south receives its drinking water from Lake Hodgson, located 3-1/2 miles south of the facility. Two wells are located near the facility. The nearest well, located at a hospital 1/4 mile northwest of the facility, is used only as an emergency backup source. The hospital is normally supplied with water by the city of Ravenna. The second well is located 1 mile north of the GE Ravenna Plant and is used for industrial purposes.

No releases to surface waters were observed during the PA/VSI nor have any documented releases been identified. The potential for releases to surface waters from any SWMU is low because all SWMUs are located indoors.

The potential for release to air from any SWMUs at the GE Ravenna Plant is low. Volatile wastes are contained in sealed drums and tanks. All wastes are managed inside the building. No releases to air from any SWMUs were observed during the VSI, nor were any documented releases identified. The facility has several air permits for process units onsite. These permits are in registration status only; therefore, they do not have emission limits. Consequently, the facility has not been cited for any violations of its air permits.

Access to the site is limited. The land to the north, east, and west of the facility is rural. Possible receptors include the residents of Ravenna, located less than 1/2 mile south of the facility. Potential contamination via air, surface water, or ground water from the facility is low; therefore, the risk is low for human exposure to contamination from the facility. There are small wetland areas within a 2 mile radius surrounding the facility. These areas vary in size from approximately 1 acre to 640 acres.

The potential for any release of hazardous constituents from the facility is low. PRC recommends no further action at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in EPA Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential release(s) to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Electric Co. Ravenna Lamp Plant (GE Ravenna Plant or the facility) in Ravenna, Ohio. The PA was completed on April 8, 1991. PRC gathered and reviewed information from Ohio EPA (OEPA) and from EPA Region 5 RCRA files.

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The VSI was conducted on July 24, 1991. It included interviews with a GE Ravenna Plant representative and a walk-through inspection of the facility. Five SWMUs were identified at the facility.

PRC completed EPA form 2070-12 using information gathered during the PA/VSI. This information is included in Attachment A. The VSI is summarized and inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The GE Ravenna Plant is located at 6800 N. Chestnut Street in Ravenna, Ohio. The facility is located on a 56-acre site in Portage County, Ohio (latitude: 41°10"52" N; longitude: 81°14"00" W) (see Figure 1).

The city of Ravenna is approximately 10 miles east of Akron, Ohio. The facility is located approximately 1 mile north of downtown Ravenna. The surrounding area is rural with several golf courses, trailer parks, and the city of Ravenna within a 2-mile radius.

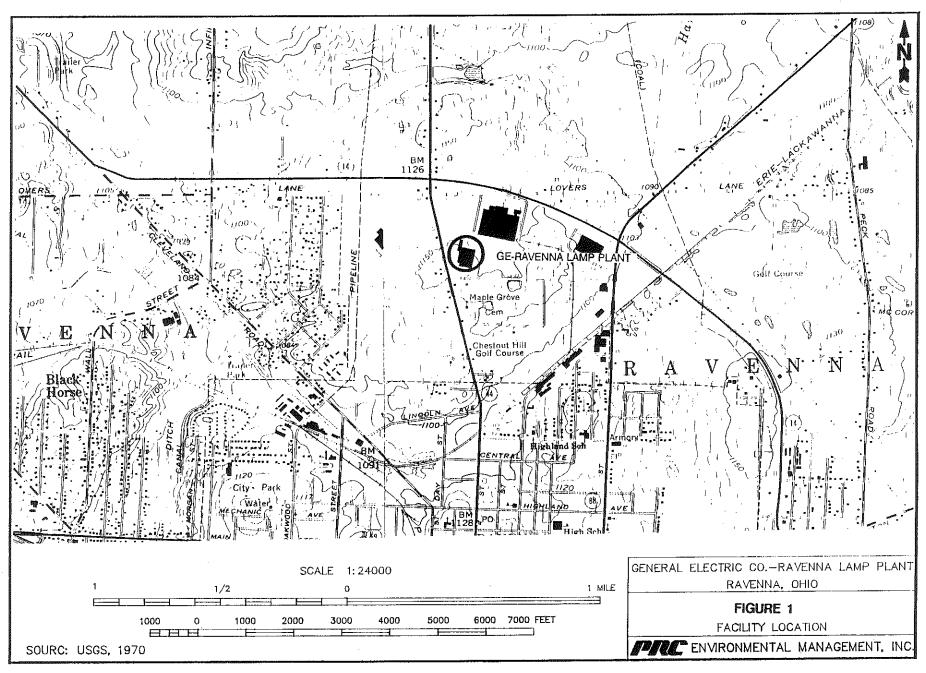
2.2 FACILITY OPERATIONS

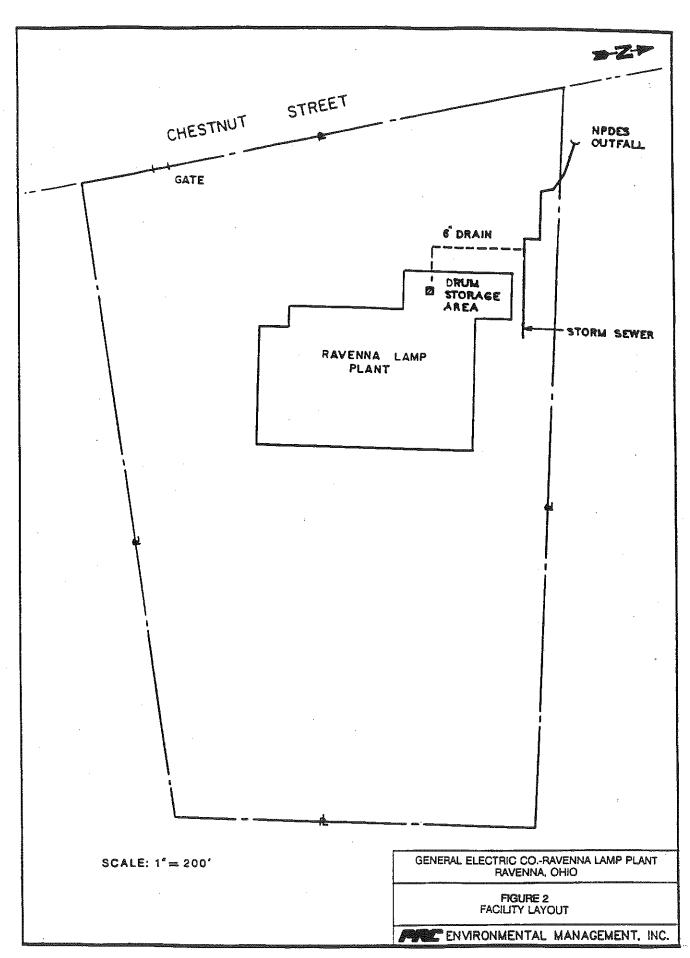
The GE Ravenna Plant has been in operation since 1972. The facility employs approximately 480 people in the production of energy efficient, high intensity discharge lamps that include mercury, multi-vapor, and Lucalox lamps and ANS sunlamp arc tubes (Killam Associates, 1990b). The primary production activity at the GE Ravenna Plant involves coating glass bulbs and electrodes. As a result of these processes, the facility handles halogenated solvents, such as trichloroethylene (TCE), and methylene chloride and nonhalogenated solvents, such as acetone. In addition, the facility also handles mercury, methanol, metal scraps, and leaded solder wastes. The facility also has an acid neutralization unit that treats 2 to 3 gallons of acid per day. The unit discharges 150 gallons per day of treated effluent into the Ravenna sewage treatment plant. Figure 2 shows the layout of the facility, including the location of all SWMUs.

2.3 WASTE GENERATING PROCESSES

The GE Ravenna Plant generates several waste streams from the operation of its production processes. Wastes include solvents, alcohols, leaded glass, leaded solder, mercury, scrap metal, and wastewaters. The generation and management of these waste streams is discussed below. Table 1 lists the SWMUs identified at the facility and their current status. Table 2 lists the

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Table 1
Solid Waste Management Units (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Drum Storage Room	Yes	Active, awaits RCRA closure approval
2	Acid Neutralization System	Yes	Active
3	Waste Leaded Glass Dumpster	No	Active
4	Scrap Metal Dumpster	No	Active
5	Leaded Solder Waste Drum Area	No	Active

^{*} A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

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Table 2
Solid Wastes

Waste/EPA Waste Code	Source	Primary Management Unit
Trichloroethylene (F001, U228)	Degreaser	SWMU I
Methylene Chloride (F002)	Cleaning process	SWMU 1
Acetone (F003, U002)	Cleaning process	SWMU 1
Methanol (F005, U154)	Manufacturing process	SWMU 1
n-Butyl Acetate (D001)	Manufacturing process	SWMU 1
Denatured Alcohol (D001)	Manufacturing process	SWMU 1
Petroleum Oil (D001)	Maintenance	SWMU 1
Waste Stoddard Solvent (D001)	Manufacturing process	SWMU 1
Mercury (U151)	Manufacturing process	SWMU 1
Acid Wastewater	Acid Neutralization	SWMU 2
Leaded Glass	Manufacturing process	SWMU 3
Scrap Metal	Manufacturing process	SWMU 4
Leaded Solder	Manufacturing process	SWMU 5
Mercury Oil (D009)	Vacuum pumps	No longer present onsite. Formerly managed in SWMU 1.
Thorium/Alcohol (D001)	Manufacturing process	No longer present onsite. Formerly managed in SWMU 1.
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solid wastes generated at the facility, their source, and the units in which they are managed.

The GE Ravenna Plant assembles high-intensity lamps. The major waste-generating processes are the bulb and electrode coating operations. These operations generate wastes of n-butyl acetate (D001) and alcohols (F005, U154, D001).

TCE (F001, U228) is used in degreasing operations in the machine shop and arc tube preparation areas. Methylene chloride (F002) and acetone (F003, U002) are low-volume wastes used for cleaning. Methylene chloride use is scheduled to be phased out by the end of 1991 (Magella, 1991b). All solvents are stored in drums and recycled offsite. Approximately 20 drums of n-butyl acetate, 24-48 drums of alcohol and slightly more than one drum each of TCE and acetone are generated each year at the plant (Magella, 1991a). TCE is reclaimed by Gold Shield in Euclid, Ohio. Acetone, denatured alcohol, butyl acetate, and methylene chloride are reclaimed by Hukill in Bedford, Ohio.

A second waste stream is generated by cleaning parts using nitric (HNO₃), hydrochloric (HCl), phosphoric (H₃PO₄), and hydrofluoric (HF) acids. These acids are treated in an acid neutralization system (SWMU 2). This system treats approximately 2 to 3 gallons of acid per day. The system discharges a total of 150 gallons per day to the Ravenna waste treatment plant (Magella, 1991a).

Mercury (U151) is used to make mercury vapor lamps. Virtually 100 percent of the mercury is used with very little waste resulting. However, a small amount of waste mercury is generated (approximately 5 pounds/year). Any waste mercury generated is shipped offsite for reclamation by B.F. Goldsmith in Evanston, Illinois.

In the past, mercury oil (D009) was also generated by vacuum pumps used at the facility. This waste was stored in SWMU 1. All mercury-containing pumps have been removed. Currently, no mercury oil waste is being generated (Magella, 1991b).

The GE Ravenna Plant also previously generated mixed radioactive/flammable wastes (thorium/alcohol, D001). This waste was stored in SWMU 1. The facility ceased generation of these wastes in 1989 (Magella, 1991b).

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Other wastes include leaded glass, leaded solder, metal scraps, and used oils. The leaded glass is sent to GE Niles-Mahoning in Niles, Ohio in dumpsters to be used as feed stock material for the Niles furnace. The lead concentration in leachate derived from the glass is below the toxicity characteristic leaching procedure (TCLP) limit for lead. Nonhazardous scrap metal is stored in dumpsters (SWMU 4) and then sent to reclaimers. Leaded solder is stored in 55-gallon drums (SWMU 5) and sent to an unspecified reclaimer for recovery of the lead. Used oils are stored in drums (SWMU 1) and taken by Canton Oil in Canton, Ohio, for recycling.

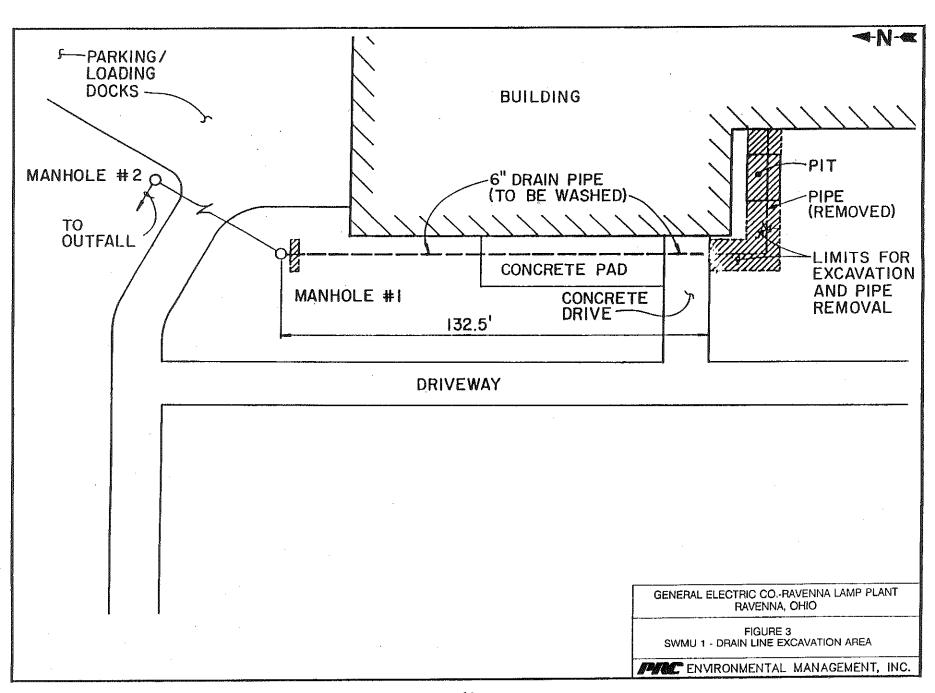
The GE Ravenna Plant has a Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) permit (NPDES No. 31F00022) issued by OEPA to discharge 60,000 gallons per day of noncontact cooling water into a storm sewer that discharges into Eckert Ditch (see Figure 2). Following plant expansion in 1984, all noncontact cooling water has been discharged to the Ravenna publicly owned treatment works (POTW). Presently, only storm water runoff is discharged to Eckert Ditch. The permit has been retained for emergency purposes.

A preliminary file review revealed that a closure plan for the drum storage room (SWMU 1) was submitted by the GE Ravenna Plant to OEPA on May 2, 1989. Implementation of this closure plan on December 13, 1989, also resulted in accumulation of additional wastes. These wastes include contaminated soil and wastewater used to wash the drain line connected to the storage room. Approximately thirteen 55-gallon drums of wastewater were generated (Magella, 1991b). There are also three 20-cubic-yard rolloff boxes containing soil excavated from the area. The contents of one rolloff box is contaminated with TCE. Two of the rolloff boxes contain clean soil (Killam Associates, 1990a). Figure 3 presents a schematic of the drain line excavation area.

2.4 RELEASE HISTORY

A preliminary review of GE's files revealed that during implementation of the closure plan, the drainage pipe leading from the drum storage room had been broken. Several gallons of hazardous constituents filled the trench around the pipe. The released liquid was pumped into a 55-gallon drum and sampled. Sampling detected the presence of 1,050 milligrams per liter of methylene chloride and 5,150 milligrams per liter of TCE. Approximately 100 feet of contaminated pipe was removed. Liquid and wash water from the trench and drain line were contained in 55-gallon drums. A total of thirteen 55-gallon drums were collected and taken offsite for disposal. The soil 2 feet above and 18 inches below the pipe was excavated, sampled, and placed in three lined, covered, 20-cubic-yard rolloff boxes. Two of the boxes contain clean

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soil; soil in the third is contaminated with TCE. During the VSI no releases were observed. At present, all unexcavated soil surrounding the pipe has been sampled and found to be clean (Magella, 1991b).

2.5 REGULATORY HISTORY

The GE Ravenna Plant submitted a RCRA Part A Permit Application to EPA (OHD 059-061-317) on November 14, 1980, to obtain RCRA interim status for a drum storage room and acid neutralization system (General Electric Company, 1980). On December 3, 1981, the Ohio Hazardous Waste Facility Approval Board approved the GE Ravenna Plant's permit for operation as a hazardous waste facility (OEPA, 1981).

On March 10, 1988, EPA issued a request for submission of a RCRA Part B Permit Application (EPA, 1988). Subsequently, on March 14, 1988, the GE Ravenna Plant submitted a request to EPA for withdrawal of its Treatment, Storage, and Disposal facility (TSDF) Part A Permit Application (GE Ravenna, 1988a).

Currently, the facility operates a drum storage room (SWMU 1) and has three other containers (SWMUs 3, 4, and 5) that are being operated to store solid wastes for reclaiming facilities. The facility also has an acid neutralization system (SWMU 2) that appears to qualify for an exemption from RCRA Subtitle C permitting requirements because it is an elementary neutralization unit (see 40 CFR Part 264.1(g)(6)).

The GE Ravenna Plant submitted a closure plan for closure of the drum storage area (SWMU 1) on September 8, 1988 (GE Ravenna, 1988b). In response to the closure plan, OEPA conducted an inspection of the drum storage unit designated for closure on November 29, 1988 (OEPA, 1988). On January 17, 1989, OEPA disapproved the closure plan, stating that the plan lacked specific drawings and descriptions of the drum storage area and procedures for decontaminating the drain system. In addition, the plan failed to provide an estimate of the volume of rinsate generated and to address removal of the mixed radioactive wastes stored onsite (OEPA, 1989a).

As a result, the GE Ravenna Plant submitted a revised closure plan to OEPA on May 2, 1989 (GE Ravenna, 1989). On July 12, 1989, the OEPA approved this closure plan with modifications. Modifications that OEPA required included contracting an independent

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professional engineer to observe closure activities; ensuring there is no leakage from the drain pipe during closure; and requesting information regarding radioactive wastes (OEPA, 1989c).

On December 13, 1989, the closure plan was implemented. At that time, the drain line from the drum storage area was discovered to be clogged. During excavation of the surrounding soil, the pipe was broken and liquid leaked into the trench. Soil from above and below the drain pipe was excavated and tested for contaminants (Killam Associates, 1990b).

On June 13, 1990, Killam Associates submitted a letter to OEPA describing the progress of the closure and requesting an extension of 180 days due to the unforeseen complications (Killam Associates, 1990c). Currently, closure activities are scheduled to be completed by October 31, 1991 (Magella, 1991b).

The GE Ravenna Plant has been cited in the past for violating applicable hazardous waste management regulations. Violations concerned improper manifest forms (40 CFR Part 262.20), facility personnel training (40 CFR Part 265.16), job description requirements (40 CFR Part 265.16(d)(2)), improper inspection forms (40 CFR Part 265.15), storage area requirements (40 CFR Part 265.35), contingency plan requirements (40 CFR Parts 265.52 and 265.53), inventory log requirements (40 CFR Part 265.73), and annual training requirements (40 CFR Part 265.16(c)) (OEPA, 1981, 1983, 1986a, 1989b).

The facility has a NPDES permit (No. 31F00022) issued on January 26, 1987, by the OEPA to discharge storm water (approximately 60,000 gallons per day) to Eckert Ditch. The permit will expire January 23, 1992.

The GE Ravenna Plant has several air permits (permits to install) for several processes at the facility. These permits are for registration of the equipment only, they do not have emission limits; consequently, the facility has not been cited for any violations of its air permits.

The GE Ravenna Plant is not subject to the notification requirements under Section 103(c) of CERCLA. No information was obtained on any other CERCLA requirements or actions regarding this facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the GE Ravenna Plant.

2.6.1 Climate

Average temperatures in Portage County, Ohio, range from a low of 26 degrees Fahrenheit ('F) in January to a high of 72 F in July. Northern areas nearest Lake Erie are markedly colder than the rest of the area in summer. Precipitation is well distributed during the year. From late fall through winter, snow squalls are frequent and total snowfall is normally heavy. Of the total annual precipitation, 60 percent usually falls in April through September. Average relative humidity in mid-afternoon is about 60 percent; humidity is greater at night, and the average at dawn is about 80 percent. The percentage of possible sunshine is 70 percent in summer and 30 percent in winter. The prevailing wind direction is from the south. Average wind speed is highest, 13 miles per hour, in January. Average annual precipitation is 38.25 inches. Average annual net precipitation is 8.25 inches, and the intensity of a 1-year 24-hour rainfall is 2 inches (National Oceanic and Atmospheric Administration, 1990).

2.6.2 Flood Plain and Surface Water

The GE Ravenna Plant is located less than 1/2 mile north of downtown Ravenna, Ohio. The facility itself is located in a light industrial area dotted with many small ponds and lakes within a 2-mile radius of the facility. Lake Rockwell is located approximately 3 1/2 miles west of the facility. Lake Hodgson is located 3 miles southwest of Ravenna. The facility is located approximately 2-1/4 miles east of the west branch of the Mahoning River and 2-1/4 miles northeast of Breakneck Creek. There are small wetland areas within a 2-mile radius of the facility. These areas vary in size from approximately 1 acre to 640 acres (U.S. Geological Survey [USGS], 1977, 1984). The facility is not located in a 100-year flood-plain area (USGS, 1974).

2.6.3 Geology and Soil

Facility-specific geology information was not available; therefore, regional information is presented.

The Pottsville Formation of Pennsylvanian age overlies the Mississippian formations and is composed of sandstones, shales, coals, and limestones. The Pennsylvanian units vary from coarse-grained crossbedded sandstones, such as the Sharon and Connoquenessing members that were deposited in delta and valley environments, to the lower limestone unit of the Mercer member that contains numerous marine fossils. The Connoquenessing Sandstone member is a coarse-to-fine-grained sandstone and silty to sandy shale. Both the units are micaceous and contain numerous plant fragments. Shale units are indicated by the darker shade of color. The Sharon member shale unit is gray-to-black, sandy to micaceous shale containing thin coal, underlay, sandstone, and siderite zones (Cushing, et al., 1931).

Deposits of glacial drift and alluvium almost completely mantle the bedrock surface in Portage County. The topography of the rock surface is shown by the contour lines to have a striking pattern of troughs. These troughs are valley systems cut by streams before or during the Pleistocene epoch and further deepened in places by ice scour. Generally, these troughs are wholly or partly filled by glacial or lacustrine deposits and are called "buried valleys" (Cushing, et al., 1931).

The present streams generally follow the buried depressions in the rock surface, flowing in linear depressions in the land surface caused by the compaction of the unconsolidated materials that fill the buried valleys. In some places moraine, outwash, and other deposits have filled these linear depressions and the modern streams, in reestablishing drainage, have cut new channels into the rock surface (Cushing, et al., 1931).

The soils of the area are of Canfield-Ravenna-Wooster association; these are nearly level to gently sloping, somewhat poorly drained to well drained soils that formed in medium-textured glacial till. This association occupies a broad belt north and south of the city of Ravenna. Canfield soils make up about 36 percent of this association, Ravenna soils 25 percent, and Wooster soils 15 percent. Canfield soils are mostly gently sloping and moderately well drained. Ravenna soils are less sloping than Canfield and Wooster soils and are somewhat poorly drained. Wooster soils are well drained, gently sloping to very steep soils (U.S. Soil Conservation Service, 1981).

2.6.4 Ground Water

Facility-specific ground water information was not available; therefore, regional information is presented.

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The principal aquifers in the consolidated rocks are the thick Pennsylvanian sandstones. The amount of water that these units can yield depends in part on the thickness and the lithologic character of the sandstones of a given area. The aquifers underneath the site are known as the Pottsville group. Principal aquifers are the Massillon sandstone and the Sharon conglomerate. Wells in the conglomerate unit provide much of the ground water used in the township. The formation is 200 feet or more thick and occurs at or near the bedrock surface over most of the area. Wells will produce sustained yields of as much as 50 gallons per minute. Greater yields, of more than 100 gallons per minute, may be available for short periods of intermittent pumping. The Berea sandstone at an altitude of 700 feet, probably contains potable water in the area north of the major east-west buried valley that underlies the southern part of the township. Some sand and gravel lenses interbedded within the bedrock may supply as much as 40 gallons per minute (Ohio DNR, 1979).

2.7 RECEPTORS

The land to the north, east, and west of the facility is rural. However, less than 1/2 mile south of the facility is the city of Ravenna with a population of approximately 12,000. The city of Ravenna receives water from a municipal water supply. The intake for the water supply is in Lake Hodgson, located approximately 3 miles southwest of the city of Ravenna. This lake is strictly used for water supply, but some restricted recreational fishing is permitted (Edwards, 1991). The nearest well is located at a hospital 1/4 mile northwest of the facility. The hospital is normally supplied with water by the city of Ravenna (Magella, 1991b): this well is used for emergency backup.

Since the prevailing wind direction is from the south, the residential population located 1/2 mile south of the facility would be at low risk to airborne contamination if a hazardous emission were released from the facility. There are small wetland areas within a 2-mile radius surrounding the facility. These areas vary in size from approximately I acre to 640 acres (USGS, 1977, 1984).

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3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1

Drum Storage Room

Unit Description:

The storage unit is located in the northwest corner of the facility (see Figure 2) in an enclosed cinderblock room. The unit consists of 144 square feet of concrete floor sloping inward from all points of egress. The concrete storage pad is in sound structural condition. Five floor drains are located in the storage unit. These drains were plugged in January 1989 (Magella, 1991a). Three drains are located at the entrances to the storage and process area. The drains exit the building and connect to the local storm sewer located west of the facility. The storm sewer discharges to the NPDES outfall. This outfall is permitted to discharge the non-contact cooling water used at the facility. The drum storage unit is depicted in photographs 1, 2, and 3.

Date of Startup:

1986

Date of Closure:

The unit is currently operating as a generator accumulation area (less than 90 days storage).

Wastes Managed:

Trichloroethylene (F001,U228)
Methylene Chloride (F002)
Acetone (F003, U002)
Methanol (F005,U154)
n-Butyl Acetate (D001)
Denatured Alcohol (D001)
Petroleum Oil (D001)
Waste Stoddard Solvent (D001)

Release Controls:

The room is explosion-proof and has cinderblock walls. The concrete floor slopes inward from all points of egress. The concrete storage pad is in sound structural condition. Drains in the room were plugged in January 1989.

History of Release:

A preliminary review of GE's files revealed that during implementation of the closure plan on December 13, 1989, the drainage pipe leading from the drum storage room had been broken. Several gallons of hazardous constituents filled the trench around the pipe. The released liquid was pumped into a 55-gallon drum and sampled. The pipe was removed. The soil 2 feet above and 18 inches below the pipe was excavated, sampled, and placed in lined, covered 20-cubic-yard rolloff boxes. During the VSI, no release was observed (PRC, 1991). Sampling of the surrounding soil indicated that all contamination had been removed (Magella, 1991b). Photographs 4, 5, and 6 depict the excavation area.

Observations:

During the VSI, no release or signs of contamination was observed. The integrity of the drums appeared sound. The excavation area was properly fenced off. Excavated soil from the area around the pipe was placed in covered and lined rolloff boxes.

SWMU 2

Acid Neutralization System

Unit Description:

The acid neutralization system consists of three polypropylene tanks located in a small room inside the facility. The first is a 150-gallon holding tank. From the holding tank, acid wastewater is pumped to the first of two 250-gallon treatment tanks. From the first treatment tank, the wastewater is fed through a filter to the second treatment tank. The system treats approximately 2 to 3 gallons of acid per day. This results in approximately 150 gallons of treated water discharged to the sanitary sewer each day. The system is permitted by OEPA and the Ravenna POTW under CWA pretreatment regulations. Photograph 7 depicts this SWMU.

Date of Startup:

1986

Date of Closure:

The unit is still in operation.

Wastes Managed:

Wastes treated by this unit are hydrochloric acid, phosphoric acid, nitric acid, and hydrofluoric acid.

Release Controls:

A drain for the tank discharges directly to the sanitary sewer system. An overflow trench drain in the room is connected to a limestone pit. The pit is an 8-foot-deep cylinder with a clay liner. The lime pit has an outlet connected to the sanitary sewer system. Photograph 8 depicts the limestone pit area.

History of Release:

There have been no documented releases of hazardous wastes or hazardous constituents from this unit.

Observations:

The acid neutralization room appeared to be in good condition (PRC, 1991).

SWMU 3

Waste Leaded Glass Dumpster

Unit Description:

The unit is a dumpster used for storage of waste leaded glass. The unit has a capacity of approximately 10 cubic yards and is situated inside the building near the loading dock. The waste is sent primarily to GE Niles-Mahoning for recycling.

Date of Startup:

1980s

Date of Closure:

The unit is still in operation.

Wastes Managed:

The unit is used for storage of nonhazardous waste leaded glass. The TCLP results indicated concentrations below the limit for lead (Magella, 1991a).

Release Controls:

There are no release controls except for the concrete floor underneath the

dumpster.

History of Release:

There have been no documented releases of hazardous wastes or hazardous

constituents from this unit.

Observations:

The unit appeared to be in good condition (PRC, 1991).

SWMU 4

Scrap Metal Dumpster

Unit Description:

The unit is a dumpster used for storage of nonhazardous waste scrap metals. The unit has a capacity of approximately 10 cubic yards and is situated inside the building near the loading dock. The waste is sent to reclaimers for recycling.

Date of Startup:

1980s

Date of Closure:

The unit is still in operation.

Wastes Managed:

The unit is used to store scrap metals.

Release Controls:

There are no release controls except for the concrete floor underneath the

dumpster.

History of Release:

There have been no documented releases of hazardous wastes or hazardous

constituents from this unit.

Observations:

The unit appeared to be in good condition (PRC, 1991).

SWMU 5

Leaded Solder Waste Drum Area

Unit Description:

The unit consists of one 55-gallon drum used to store leaded solder and associated parts for reclamation. The drums are located just outside the hazardous waste drum storage area (SWMU 1). The leaded solder is sent to

a reclaimer for recovery of the lead.

Startup:

1980s

Date of Closure:

The unit is still in operation.

Wastes Managed:

The unit is used to store leaded solder.

Release Controls:

There are no release controls except for the concrete floor underneath the

drums.

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History of Release:

There have been no documented releases of hazardous wastes or hazardous

constituents from this unit.

Observations:

The unit appeared to be in good condition (PRC, 1991).

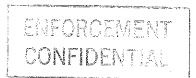
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4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the GE Ravenna Plant. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed conditions, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the GE Ravenna Plant and suggested further actions.

SWMU 1

Drum Storage Room

Conclusions:

This unit is in an enclosed cinderblock room with drains that were plugged in 1989. Drums are staged on the concrete floor that slopes inward from all points of egress. The unit poses a low threat of current or future release. The probability of a release to environmental media is summarized below.

Ground water: Low; the unit is indoors with a concrete floor and sealed drains.

Surface water: Low; the distance to the nearest surface water limits the potential for a release to this media.

Air: Low; the wastes are in sealed drums stored indoors. The stored wastes contain volatile organics that volatilize readily upon exposure to air.

On-site soil: Low; the unit is located indoors, thus limiting the potential of a release to this media.

Recommendations:

No further action is recommended at this time.

SWMU 2

Acid Neutralization System

Conclusions:

The unit is located in a small cinderblock room inside the facility. All drains from the unit lead to the sanitary sewer system. The system treats approximately 2-3 gallons of acid per day. There is low potential for release to air. Possible receptors in case of a release to air include GE workers. The probability of a release to other environmental media is low. The probability of a release to environmental media is summarized below.

Ground water: Low; the unit is indoors, thus limiting the potential of a release to this media.

Air: Low; the unit is indoors and drains into the sanitary sewer. However, the system handles strong corrosive acids; consequently, tank failure or leaks in the plumbing may occur. GE workers would be subject to the

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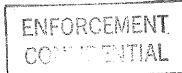
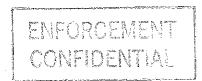


Table 3 SWMU Summary

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SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Drum Storage Room	1986 - present	Yes, sampling in 1989, 1990	No further action.
2. Acid Neutralization Tank	1986 - present	None	No further action.
3. Waste Leaded Glass Dumpster	1980s - present	None	No further action
4. Scrap Metal Dumpster	1980s - present	None	No further action
5. Leaded Solder Waste Drum Area	1980s - present	None	No further action

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highest exposures in case of a release.

Surface water: Low; the distance to the nearest surface water limits the potential of a release to this media.

On-site soil: Low; the waste is managed indoors, thus limiting the potential

of a release to this media.

Recommendations:

No further action is recommended at this time.

SWMU 3

Waste Leaded Glass Dumpster

Conclusions:

This unit consists of a dumpster on a concrete floor. The unit is indoors and handles only nonhazardous wastes. The probability of a release to environmental media is low. The probability of a release to environmental media is summarized below.

Ground water: Low; the unit is indoors, thus limiting the potential of a release to this media.

Surface water: Low; the nearest surface water is 2 miles from the facility.

Air: Low; the unit is indoors and handles nonvolatile wastes.

On-site soil: Low; the waste is managed indoors, thus limiting the potential of a release to this media.

Recommendations:

No further action is recommended at this time.

SWMU 4

Scrap Metal Dumpster

Conclusions:

This unit consists of a dumpster on a concrete floor. The unit is indoors and handles only nonhazardous wastes. The probability of a release to environmental media is low. The probability of a release to environmental media is summarized below.

Ground water: Low; the unit is indoors, thus limiting the potential of a release to this media.

Surface water: Low; the nearest surface water is 2 miles from the facility.

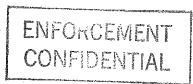
Air: Low; the unit is indoors and handles nonvolatile wastes.

On-site soil: Low; the waste is managed indoors, thus limiting the potential of a release to this media.

Recommendations:

No further action is recommended at this time.

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SWMU 5

Leaded Solder Waste Drum Area

Conclusions:

This unit consists of 55-gallon drums used to store leaded solder waste. The unit is indoors and handles only nonhazardous wastes. The probability of a release to environmental media is low. The probability of a release to environmental media is summarized below.

Ground water: Low; the unit is indoors, thus limiting the potential of a release to this media.

Surface water: Low; the nearest surface water is 2 miles from the facility.

Air: Low; the unit is indoors and handles nonvolatile wastes.

On-site soil: Low; the waste is managed indoors, thus limiting the potential of a release to this media.

Recommendations:

No further action is recommended at this time.

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Ohio EPA, 1981. Hazardous Waste Facility Approval Board, December 3.

Ohio EPA, 1983. RCRA Inspection Letter to GE Ravenna Lamp Plant, July 11.

Ohio EPA, 1986a. RCRA Inspection Letter to GE Ravenna Lamp Plant, April 15.

Ohio EPA, 1986b, Return to Compliance Letter to GE Ravenna Lamp Plant, September 8.

Ohio EPA, 1988. Closure Plan Inspection Letter to GE Ravenna Lamp Plant, December 28.

Ohio EPA, 1989a. Closure Plan Disapproval, January 17.

Ohio EPA, 1989b. RCRA Inspection Letter, January 31.

Ohio EPA, 1989c. Closure Plan Approval, July 12.

PRC, 1991. Visual Site Inspection, July 24.

U.S. EPA, 1988. Request for TSD Facility Part B Application, March 10.

U.S. Geological Survey (USGS), 1974. Flood Prone Area Maps.

USGS, 1977. Ravenna, Ohio, 7.5-Minute Topographic Map.

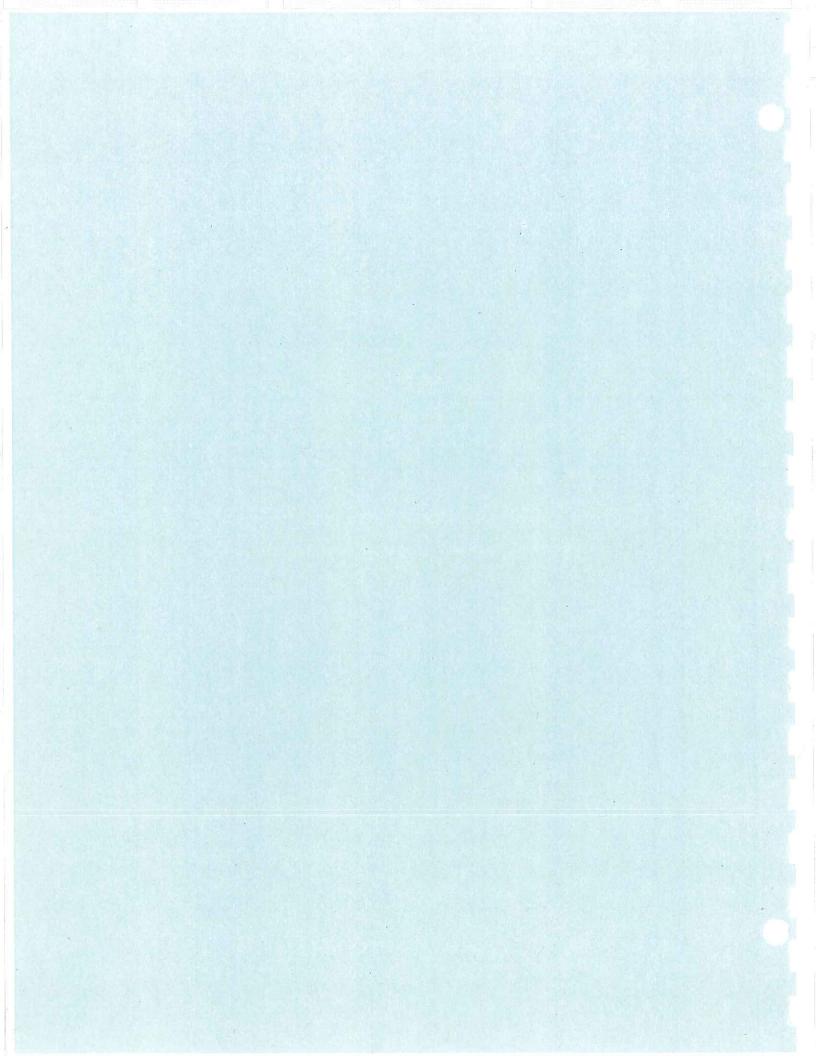
USGS, 1984. Kent, Ohio, 7.5-Minute Topographic Map.

U.S. Soil Conservation Service, 1981. Soil Survey of Cuyahoga County, Ohio.

U.S. Geological Survey, 1986. Water-Supply Paper 2275.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12





POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION							
01 STATE	02 SITE NUMBER						
OH	OUD050061317						

II. SITE NAME AND LOCATION				72/10/00/10/10		
01 SITE NAME (Legal, common, of descriptive name of site) General Electric Co. Ravenna Lamp Plant			r, ROUTE NO. OF Chestnut Stree		tion identifier	
03 CITY Ravenna		04 STATE OH	05 ZIP CODE 44266	06 COUNTY Portage	07 COUNTY CODE 173	08 CONG DIST 11
	NGITUDE °14'00"W			hanninga Hoyeanna Hillian III.	- 10 HO OCC	
10 DIRECTIONS TO SITE (Starting from nearest public roal I-80 East from Cleveland. Take Route 14 South		nna. Right on	Chestnut. GE	E is on the left	,	
III. RESPONSIBLE PARTIES						
01 OWNER (if known) General Electric Company - Lighting		02 STREE Nela	T (Business, maili Park	ng residential)		
03 CITY Cleveland		04 STATE OH	05 ZIP CODE 44112	06 TELEPHONE (216) 266		
07 OPERATOR (If known and different from owner) General Electric Co. Ravenna Lamp Plant			T <i>(Business, maili</i> Chestnut St r e	•		
оэ сіту Ravenna		10 STATE OH	11 ZIP CODE 44266	12 TELEPHONE (216) 293		
13 TYPE OF OWNERSHIP (Check one) (Agency Name) G. STATE D. COUNTY DE. MUNICIPAL (Agency Name) (Specify)					AL .	
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all f. X A. RCRA 3010 DATE RECEIVED: / / MONTH DAY YEAR	B. UNCONTRO	OLLED WASTE SI	TE (CERCLA 103	c) DATE RECEIV	'ED: / / MONTH DAY	
IV. CHARACTERIZATION OF POTENTIAL HAZAR				APPLIANT AND A STATE OF		
□ NO			C. STATE F. OTHER: Management, I	(Spi	D. OTHER CONTR	ACTOR
02 SITE STATUS (Check one) M. A. ACTIVE D. B. INACTIVE D. C.UNKNO	1	03 YEARS OF OF		YEAR	D UNKN	NWC
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KN	IOWN, OR ALLEGE	D		······································		
Substances found onsite include trichloroethyle wastes.	ene, methylene o	chloride, aceto	ne, methanol,	butyl acetate,	alcohol, mercu	ıry, mixed radioactive
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMEN	IT AND/OR POPUL	ATION				
Potential hazard to environment and surroundi managed indoors with adequate secondary con		s minimal. M	ost activities a	re conducted i	ndoors. Hazai	rdous substances are
V. PRIORITY ASSESSMENT				3		
01 PRIORITY FOR INSPECTION (Check one. If high or media	ım is checked, con	nplete Part 2 - Wa	ste Information a	nd Part 3 - Descri	otion of Hazardous	s Conditions and Incidents.)
© A. HiGH © B. MEDIUM (Inspection required promptly) (Inspection required)	🏿 C. LO\ (Inspect of	W n time-available b	D D. NOI		complete current	disposition form)
VI. INFORMATION AVAILABLE FROM				(1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-		
01 CONTACT Kevin Pierard	02 OF (Agency/O U.S. EPA	Organization)	NATIONAL DESCRIPTION OF THE PROPERTY OF THE PR			03 TELEPHONE NUMBER (312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT Thomas Sinski EPA FORM 2070-12(17-81)	05 AGENCY	06 OF	IGANIZATION PRC-EMI		NE NUMBER 556-2811	08 DATE 09/ 05/ 91 MONTH DAY YEAR

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POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICA	TION
01 STATE	02 SITE NUMBER
OH	07770060061217

II WACTE C	TATES, QUANTITIES, AND CH	IADACTEDICTICS			
O1 PHYSICAL STATES (Check all that apply) □ A. SOLID □ E. SLURRY □ B. POWDER, FINES □ G. GAS □ D. OTHER (Specify)		02 WASTE (//Mensus must I TON	QUANTITY AT SITE res of waste quantities be independent) 5.5/year YARDS F DRUMS	MA. TOXIC B. CORROSIV C. RADIOACT D. PERSISTEN E. SOLUBLE	IVE II J. EXPLOSIVE T II K. REACTIVE II L. INCOMPATIBLE S II M. NOT APPLICABLE
III. WASTE 1	TYPE	NO. O			
CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS	
SLU	SLUDGE				Western State Control of the Control
OLW	OILY WASTE				
SOL	SOLVENTS	3,602	Pounds	Solvents (ignitable, volatile	toxic)
PSD	PESTICIDES				
осс	OTHER ORGANIC CHEMICALS	7,832	Pounds	Alcohols (ignitable)	
10¢	INORGANIC CHEMICALS				
ACD	ACIDS				
BAS	BASES		Marian Carlos de Company		A AMARAMATA A
MES	HEAVY METALS		-		
IV. HAZARE	OOUS SUBSTANCES (See Appen	dix for most frequently c	ited CAS Numbers)		
CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL	METHOD 05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	TRICHLOROETHYLENE	0079-01-6	Drum		
SOL	METHYLENE CHLORIDE	0075-09-2	Drum		
SOL	ACETONE	0067-64-1	Drum		
occ	ALCOHOL		Drum		
occ	n-BUTYL ACETATE	000-123-864	Drum		
	- 1640-00-1-1-10-0-1-1-1-1-1-1-1-1-1-1-1-1-1	AND THE PERSON OF THE PERSON O		10004.7	
	NATIONAL NAT				
		- William			
V. FEEDST	OCKS (See Appendix for CAS I	Numbers)			And the second s
CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	0.000		FDS	The state of the s	
FDS			FDS		
FDS	7)+ 10d Oct.	Addition of the second	FDS		
FDS			FDS	- COM/O Mo	
VI. SOURCI	ES OF INFORMATION (Cite spec	cific references; e.g., sta	te files, sample analysis,	reports)	
- Managaran	eview of Ohio EPA files. GE	Ravenna 1990 Facilit	y Annual Hazardous V	Vaste Report. Visual Site	Inspection (July 24, 1991).
EPA FORM 20	070-12(17-81)		the second secon		



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION					
01 STATE	02 SITE NUMBER				

II. HAZARDOUS CONDITIONS AND INCIDENTS							
01 D A. GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 0	02 D . 04	OBSERVED (DATE: NARRATIVE DESCRIPTION		B !	POTENTIAL	ū	ALLEGED
The nearest well in use is 1 mile to the north and i	it is used	d strictly for industrial pur	poses.				
			SARVITY				
01 B. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 0	02 D 04	OBSERVED (DATE:NARRATIVE DESCRIPTION)	B	POTENTIAL	O	ALLEGED
The nearest major surface water is 3-1/2 miles we	st of the	facility. There are a few	small pone	ds w	ithin a 2-mile rac	lius of	the facility.
01 C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED: 0	02 D 04	OBSERVED (DATE:NARRATIVE DESCRIPTION)	а	POTENTIAL	0	ALLEGED
Volumes involved are small. There are no nearby	y residen	ces.					
A. M. D. FIREINO AND STREET							
01 ME D. FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED: 0-20	02 E 04	OBSERVED (DATE:)	2	POTENTIAL	O	ALLEGED
Wastes generated include ignitable alcohols, acetone, and butyl acetate (D001). However, this waste is handled indoors.							
01 D E. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED; 0	02 □ 04	OBSERVED (DATE:)	D	POTENTIAL	•	ALLEGED
Access to the site is limited.							
01 2 F. CONTAMINATION OF SOIL 03 AREA POTENTIALLY AFFECTED: 1/8 (Acres)	02 2 4 04	OBSERVED (DATE: 12/13/89 NARRATIVE DESCRIPTION		G	POTENTIAL	0	ALLEGED
Implementation of the closure plan resulted in contamination of soil during excavation and cleaning of a drain line. All contaminated soil was excavated and placed in a rolloff box for disposal.							
01 G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 0	02 D 04	OBSERVED (DATE:		0	POTENTIAL	n	ALLEGED
The city of Ravenna is on municipal water. The nearest well being used is 1-mile to the north. It is used strictly for industrial purposes.							
01 M H. WORKER EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED: 0-20		OBSERVED (DATE:		E2	POTENTIAL	G	ALLEGED
GE workers (drum handlers) could be exposed to	solvent	fumes.					
01 II I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED: 0	02 □ 04	OBSERVED DATE:NARRATIVE DESCRIPTION)	D	POTENTIAL	0	ALLEGED
None.							
CDA CODIA COMA AMAS ATT						,	
EPA FORM 2070-12(17-81)		·					



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

I. IDENTIFICATION							
01 STATE	02 SITE NUMBER						

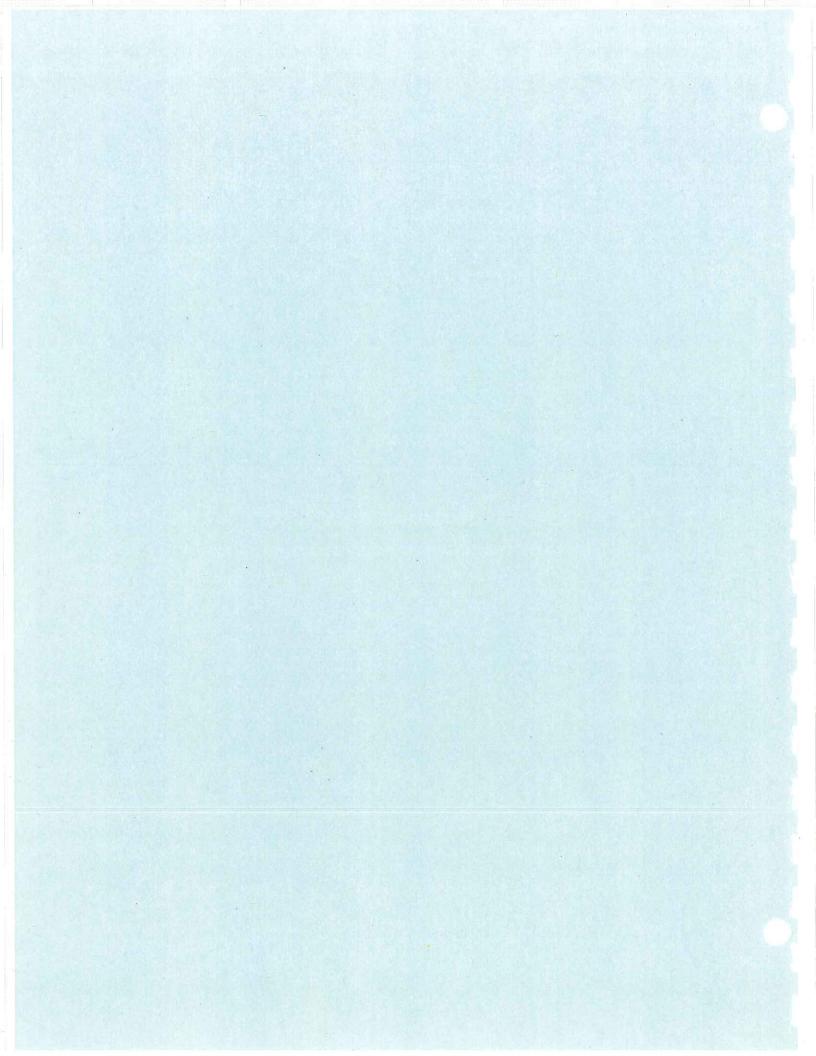
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

II. HAZARDOUS CONDITIONS AND INCIDENTS (Conti	inued)	· · · · · · · · · · · · · · · · · · ·				
01 D J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION		OBSERVED (DATE:) 🗖	POTENTIAL	D	ALLEGED
None.						
01 C K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION	02 🗖	OBSERVED (DATE:) 0	POTENTIAL	П	ALLEGED
None.						
01 CL. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 🗖	OBSERVED (DATE:) 5	POTENTIAL	0	ALLEGED
04 NARRATIVE DESCRIPTION						·
None.						:
01 E. W. WINSTELL CONT.						
01 M. UNSTABLE CONTAINMENT OF WASTES 03 POPULATION POTENTIALLY AFFECTED:	02 [] 04	OBSERVED (DATE:) 🛚	POTENTIAL		ALLEGED
None.						
None.						
01 N. DAMAGE TO OFF-SITE PROPERTY	02 🖽	OBSERVED (DATE:	\ E	I POTENTIAL	n	ALLEGED
04 NARRATIVE DESCRIPTION	-	10/1/2	~		_	
None.						
01 & O. CONTAMINATION OF SEWERS, DRAINS, WWTPS 04 NARRATIVE DESCRIPTION	s c	2 M OBSERVED (DATE: 12/13/89	ט פ	POTENTIAL	ū	ALLEGED
Drain line leading to Eckert Ditch was contaminat	ed with	methylene chloride and TCE	 Арргохі 	mately 100 feet of co	ntan	ninated pipe was
removed.		•	• •	• -		• •
01 D P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 🛭	OBSERVED (DATE:	_) [1 POTENTIAL		ALLEGED
None.						
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL,	OR ALLE	GED HAZARDS				

None.	- C-Wes					
III. TOTAL POPULATION POTENTIALLY AFFECTED:		0-20 site workers		th ranks to have an all which the models of a sure and a sure of the sure of t		· · · · · · · · · · · · · · · · · · ·
IV. COMMENTS						
Site appears to present a minimal threat to human health and the environment.						
V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)						
Preliminary review of Ohio EPA files. Telephone 1991).	e comm	unication with Jim Magella (GE Ravent	na). Visual Site Inspe	ctio	n (July 24,

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ATTACHMENT B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS



VISUAL SITE INSPECTION SUMMARY

General Electric Co., Ravenna Lamp Plant Ravenna, Ohio 44667

Date:

7/24/91

Facility Representative:

Jim Magella, GE Ravenna (216) 297-0861

Inspection Team:

Dave Phillips, PRC Guy Tomassoni, PRC Tom Sinski, PRC

Photographer:

Guy Tomassoni

Weather Conditions:

Sunny and warm (75°F)

Summary of Activities:

The visual site inspection began at 9:40 a.m. at the GE Ravenna Lamp Plant at 6800 N. Chestnut Street in Ravenna, Ohio. Guy Tomassoni reviewed the purpose of the visit and the overall U.S. EPA Region 5, Environmental Priorities Initiative Program with Jim Magella, the GE representative. Jim Magella then gave an overview of the history of the facility and the operations occurring at the plant. Waste generation, storage, and disposal were discussed at length. Photographs taken during the VSI are presented on the following pages.

The PRC team inspected all SWMUs at the facility. The drain line excavation area was examined closely.

At 11:00 a.m., the PRC inspection team and Jim Magella returned to the conference room for debriefing. After a brief exit interview the PRC team left the facility at 11:10 a.m.

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Photograph No. Orientation:

North

Location: SWMU 1 Date: July 24, 1991

Description: This photograph shows the drum storage room with 55-gallon drums of spent solvents

and alcohols.



Photograph No. Orientation:

Northeast

Location: SWMU 1 Date: July 24, 1991

This photograph shows the drum storage room with 55-gallon drums of spent solvents

Description: and alcohols.



Photograph No. Orientation:

Location: SWMU 1 East Date:

July 24, 1991 Description: Drum Storage Room trench drain. The drain line led to Eckert Ditch and was plugged

in 1989.



Photograph No. Orientation:

Description:

Date:

Location: SWMU 1 July 24, 1991

Drain line excavation area. Excavation trench is to the upper left in the photograph.



Photograph No. Orientation: Description:

5 Location: SWMU 1
East Date: July 24, 1991
Drain line excavation area. Excavation trench is in the shadow in the middle of the

photograph.



Photograph No. Orientation:

Description:

6 Nor

Northeast

Excavation trench. Drain pipe has been removed.

Location: SWMU 1
Date: July 24, 1991



Photograph No. Orientation:

Description:

Location: SWMU 2 July 24, 1991

Acid neutralization system. Drain in room leads to limestone ditch.



Photograph No. Orientation: Description:

Location: SWMU 2 Unknown Date:

Wooden pallet sitting on top of limestone ditch cover. Ditch is an 8-foot-deep cylinder. It is clay lined and has an outlet pipe connecting to the sanitary sewer.

July 24, 1991

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

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Gry Tomassoni-(PAC) Tom Suski - (PRC) (35) Dia Phillips (PRC) Brething w/ Jin Muzella (FE) 9:40 Amond for USI Q GE Ravenne Lamp Plant

Assemble high - 1-tensity lights Overview of GE Plant Operhous and Warte generating Proceeds Washstreams

all sobuts as recycled of it whith, TCE, nothylous albridge 20 duns of n-buff auth Coting granton generates aceton, - Sout solvent

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B.E. RAVENIA 7/24/91 TAL DAM ASSEMBLY - Hoph INTENSITY LAMPS Hy, Da, Multi-Vapor 2 pays Regresser TCE.

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Blackestry for clean-up. Bef vel-Buttle exetate
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Neuleslysten room with dean to limetime. Helling tak & reuleslyston tak solvent was los alcapel stored or well Execution tested every joint in pipe The during of wash with ... Verrigites of sorap notals 3 dumpster of enterment and lineaton pet - 8 + T deep oftention day line gou to sanday sewer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

WMD RCRA RECORD CENTER OFF

REPLY TO ATTENTION OF: 5HR-12

July 3, 1991

Mr. James Magella Manufacturing Engineer General Electric Ravenna Lamp Plant 6800 N. Chestnut Street Ravenna, Ohio 44266

Re:

Visual Site Inspection General Electric - Ravena Lamp Plant, OHD 059 061 317

Dear Mr. Magella:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for July 24, 1991. The inspection team will consist of Guy Tomassoni and Tom Sinski of PRC Environmental Management, Inc., contractors for the U.S. EPA.

Mr. James Magella Page Two

Representatives of the Ohio Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests, or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

cc: David Sholtis, Ohio EPA - Columbus Edward Kitchen, Ohio EPA - Columbus

Dave Wertz, Ohio EPA - Northeast District